FORM ADV

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

Primary Business Name: KNIGHTS OF COLUMBUS ASSET ADVISORS LLC CRD Number: 174129 Annual Amendment - All Sections Rev. 10/2021 3/29/2024 10:33:06 PM Example of the section of the

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

Item 1 Identifying Information

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

- A. Your full legal name (if you are a sole proprietor, your last, first, and middle names): KNIGHTS OF COLUMBUS ASSET ADVISORS LLC
- B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A.
 KNIGHTS OF COLUMBUS ASSET ADVISORS LLC

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

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

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

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

 \square your legal name or \square your primary business name:

D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: 801-80844
(2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:

(3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers:

1688666

CIK Number

E. (1) If you have a number ("CRD Number") assigned by the FINRA's CRD system or by the IARD system, your CRD number: 174129

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

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

No Information Filed

- F. Principal Office and Place of Business
 - (1) Address (do not use a P.O. Box):
 Number and Street 1:
 Number and Street 2:

 NEW HAVEN
 State:
 Country:
 ZIP+4/Postal Code:

 NEW HAVEN
 Connecticut
 United States
 06510

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

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

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

Normal business hours at this location: 9:00 A.M. - 5:00 P.M.

(3) Telephone number at this location: 203-752-4502

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

(5) What is the total number of offices, other than your principal office and place of business, at which you conduct investment advisory business as of

| | the end of your most i 1 | recently completed fiscal year? | | | | |
|----|---|---|---|---|-----------------|-----------|
| G. | Mailing address, if differen | t from your <i>principal office and place</i> | e of business address: | | | |
| | Number and Street 1: | | Number and Street 2: | | | |
| | City: | State: | Country: | ZIP+4/Postal Code: | | |
| | If this address is a private | e residence, check this box: $lacksquare$ | | | | |
| H. | If you are a sole proprieto | r, state your full residence address | s, if different from your <i>principa</i> | office and place of business address in Item 1.F.: | | |
| | Number and Street 1: | | Number and Street 2: | | | |
| | City: | State: | Country: | ZIP+4/Postal Code: | | |
| Ι. | Do you have one or more LinkedIn)? | websites or accounts on publicly av | vailable social media platforms | (including, but not limited to, Twitter, Facebook and | | o No |
| | If a website address serves addresses for all of the othe available social media platfo | s as a portal through which to access er information. You may need to list | s other information you have pu more than one portal address. I ontent. Do not provide the indivi | cly available social media platforms on Section 1.1. of s blished on the web, you may list the portal without lis Do not provide the addresses of websites or accounts o idual electronic mail (e-mail) addresses of employees o | ting on publ | |
| I | Chief Compliance Officer | | | | | |
| 5. | (1) Provide the name and | contact information of your Chief C Compliance Officer, if you have one | | n <i>exempt reporting adviser</i> , you must provide the co em 1.K. below. | ntact | |
| | Name: | | Other titles, if any: | | | |
| | Telephone number: | | Facsimile number, if any: | | | |
| | Number and Street 1: | | Number and Street 2: | | | |
| | City: | State: | Country: | ZIP+4/Postal Code: | | |
| | Electronic mail (e-mail) ac | ddress, if Chief Compliance Officer h | has one: | | | |
| | | npany Act of 1940 that you advise f mber (if any): | | you, a <i>related person</i> or an investment company reg officer services to you, provide the <i>person's</i> name a | | |
| K. | • • | tact Person: If a person other than may provide that information here. | | is authorized to receive information and respond to | questi | ions |
| | Name: | | Titles: | | | |
| | Telephone number: | | Facsimile number, if any: | | | |
| | Number and Street 1: | | Number and Street 2: | | | |
| | City: | State: | Country: | ZIP+4/Postal Code: | | |
| | Electronic mail (e-mail) ad | ddress, if contact person has one: | | | | |
| L. | • | all of the books and records you ar our principal office and place of busine | | ion 204 of the Advisers Act, or similar state law, | Yes | 6 No O |
| | If "yes," complete Section 7 | 1.L. of Schedule D. | | | | . NI - |
| M. | Are you registered with a | foreign financial regulatory authority | ſ? | | ves O | s No |
| | • | registered with a foreign financial re s," complete Section 1.M. of Schedul | | nave an affiliate that is registered with a foreign financ. | ial | |
| | | | | | Yes | s No |
| N. | Are you a public reporting | company under Sections 12 or 15(| d) of the Securities Exchange | Act of 1934? | 0 | \odot |
| | | | | | Yes | s No |
| Ο. | | more in assets on the last day of y imate amount of your assets: \$10 billion | our most recent fiscal year? | | 0 | 0 |

- ♠ \$10 billion to less than \$50 billion

o \$50 billion or more

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

P. Provide your *Legal Entity Identifier* if you have one: 549300HQX8YVDUZCTK05

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

SECTION 1.B. Other Business Names

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

Name: BOSTON ADVISORS

Jurisdictions

| - | | |
|------|--|---|
| E IL | ne 🗖 | SC SC |
| 🗖 IN | □ NV | SD SD |
| | n NH | TN TN |
| 🗖 KS | L NJ | П ТХ |
| Г КҮ | | 🗖 UT |
| LA | □ NY | T VT |
| 🗖 ME | □ NC | |
| MD | nd ND | |
| MA | Г он | □ wa |
| Г MI | Гок | □ wv |
| MN | | □ wi |
| MS | D PA | □ wy |
| П МО | PR | Cother: |
| 🗖 MT | 🗖 RI | |
| | IN IA KS KY LA ME MD MA MI MN MS MO | IN NV IA NH KS NJ KY NM LA NY ME NC MD ND MA OH MI OK MN OR MS PA MO PR |

SECTION 1.F. Other Offices

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

| Number and Street 1: 33 ARCH STREET | | Number and Street 2: | |
|--|---------------------------------------|----------------------|--------------------|
| City: | State: | Country: | ZIP+4/Postal Code: |
| BOSTON | Massachusetts | United States | 02110 |
| If this address is a private residence, check th | is box: 🗖 | | |
| Telephone Number: 617-348-3180 | Facsimile Number, if any: | | |
| If this office location is also required to be reg adviser on the Uniform Branch Office Registrat | | • | |
| How many <i>employees</i> perform investment adv 20 | isory functions from this office loca | ation? | |
| Are other business activities conducted at this (1) Broken declar (registered or upperiate | | oly) | |
| (1) Broker-dealer (registered or unregistered) | su) | | |

(2) Bank (including a separately identifiable department or division of a bank)

(3) Insurance broker or agent

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

□ (5) Registered municipal advisor

(6) Accountant or accounting firm

🔲 (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

SECTION 1.1. Website Addresses

List your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not limited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.1. for each website or account on a publicly available social media platform.

Address of Website/Account on Publicly Available Social Media Platform: https://www.kofcassetadvisors.org

Address of Website/Account on Publicly Available Social Media Platform: https://www.linkedin.com/company/boston-advisors

Address of Website/Account on Publicly Available Social Media Platform: https://www.bostonadvisors.com

Address of Website/Account on Publicly Available Social Media Platform: https://www.linkedin.com/company/kocaa

SECTION 1.L. Location of Books and Records

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

Name of entity where books and records are kept: KNIGHTS OF COLUMBUS ASSET ADVISORS

Number and Street 1: 33 ARCH STREET City: BOSTON

State: Massachusetts Number and Street 2:

Country: United States ZIP+4/Postal Code: 02110

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

Telephone Number: 617-348-3180

Facsimile number, if any:

This is (check one): o one of your branch offices or affiliates.

o a third-party unaffiliated recordkeeper.

other.

Briefly describe the books and records kept at this location. RECORDS PERTAINING TO THE BOSTON OFFICE

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

No Information Filed

Item 2 SEC Registration/Reporting

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

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

You (the adviser):

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

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

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

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

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

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

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

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

(11) are an Internet adviser relying on rule 203A-2(e);

(12) have **received an SEC order** exempting you from the prohibition against registration with the SEC;

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

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

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

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

| ✓ AL | | ☑ NE | ✓ SC |
|-------|-------|-------|-----------------|
| ☑ AK | ☑ IN | ✓ NV | SD SD |
| ✓ AZ | | ☑ NH | ✓ TN |
| R AR | KS | UN I | ▼ _{TX} |
| CA CA | ✓ KY | NM NM | Image: UT |
| 🗹 со | ✓ LA | ✓ NY | VT VT |
| 🗹 ст | ME ME | NC NC | |
| ☑ DE | MD MD | ND ND | VA VA |
| DC DC | MA MA | 🗹 он | VA WA |
| FL FL | MI MI | 🗹 ок | ₩v |
| 🗹 GA | MN MN | ☑ OR | 🗹 WI |
| 🗖 GU | MS | PA | ₩Y |

| R HI | MO | PR | |
|------|----|-------|--|
| ☑ ID | MT | RI RI | |

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

SECTION 2.A.(8) Related Adviser

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

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser

SEC Number of Registered Investment Adviser

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

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

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

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

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

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

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

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

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

SECTION 2.A.(12) SEC Exemptive Order

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

Application Number:

803-

Date of order:

Item 3 Form of Organization

If you are filing an *umbrella registration*, the information in Item 3 should be provided for the *filing adviser* only.

- A. How are you organized?
 - Corporation
 - Sole Proprietorship
 - Limited Liability Partnership (LLP)
 - O Partnership
 - Limited Liability Company (LLC)

- ♂ Limited Partnership (LP)
- O Other (specify):

If you are changing your response to this Item, see Part 1A Instruction 4.

- B. In what month does your fiscal year end each year? DECEMBER
- C. Under the laws of what state or country are you organized?
 State Country
 Delaware United States

If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.

If you are changing your response to this Item, see Part 1A Instruction 4.

| Ite | em 4 Successions | | | |
|-----|--|-----|------|---|
| | | Yes | ; Ne | С |
| A. | Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)? | 0 | 0 | 5 |
| | If "yes", complete Item 4.B. and Section 4 of Schedule D. | | | |

B. Date of Succession: (MM/DD/YYYY)

If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.

SECTION 4 Successions

No Information Filed

Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.

Employees

If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).

- A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.
 225
- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
 206
 - (2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?
 - (3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser* representatives?

197

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

0

0

- (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency? 182
- (6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?

In your response to Item 5.B. (6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on

your behalf.

Clients

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

- C. (1) To approximately how many *clients* for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?
 - (2) Approximately what percentage of your *clients* are non-*United States persons*?
 0%
- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

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

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

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

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

| Type of <i>Client</i> | (1) Number of Client(s) | (2) Fewer than 5 <i>Clients</i> | (3) Amount of Regulatory Assets under Management |
|---|----------------------------|------------------------------------|---|
| (a) Individuals (other than high net worth individuals) | 2783 | | \$ 402,942,042 |
| (b) High net worth individuals | | N | \$ 6,044,929 |
| (c) Banking or thrift institutions | 0 | | \$ O |
| (d) Investment companies | 10 | | \$ 1,060,758,117 |
| (e) Business development companies | 0 | | \$ O |
| (f) Pooled investment vehicles (other than investment companies and business development companies) | 4 | | \$ 390,082,758 |
| (g) Pension and profit sharing plans (but not the plan participants or government pension plans) | 0 | <u>v</u> | \$ 54,442,025 |
| (h) Charitable organizations | 8 | | \$ 93,896,182 |
| (i) State or municipal <i>government entities</i> (including government pension plans) | 0 | N | \$ 42,154,010 |
| (j) Other investment advisers | 0 | | \$ O |
| (k) Insurance companies | 0 | V | \$ 25,192,453,301 |
| (I) Sovereign wealth funds and foreign official institutions | 0 | | \$ O |
| (m) Corporations or other businesses not listed above | 0 | | \$ O |
| (n) Other: | 0 | | \$ O |

Compensation Arrangements

- E. You are compensated for your investment advisory services by (check all that apply):
 - ☑ (1) A percentage of assets under your management
 - (2) Hourly charges
 - (3) Subscription fees (for a newsletter or periodical)
 - □ (4) Fixed fees (other than subscription fees)
 - □ (5) Commissions
 - □ (6) Performance-based fees
 - (7) Other (specify):

Item 5 Information About Your Advisory Business - Regulatory Assets Under Management

Regulatory Assets Under Management

F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios?

(2) If yes, what is the amount of your regulatory assets under management and total number of accounts?

| | U.S. Dollar Amount | Total Number of Accounts |
|--------------------|-----------------------|--------------------------|
| Discretionary: | (a) \$ 27,242,773,364 | (d) 3,799 |
| Non-Discretionary: | (b) \$ 0 | (e) 0 |
| Total: | (c) \$ 27,242,773,364 | (f) 3,799 |

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

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

\$ O

Item 5 Information About Your Advisory Business - Advisory Activities

Advisory Activities

G.

What type(s) of advisory services do you provide? Check all that apply.

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

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

- H. If you provide financial planning services, to how many *clients* did you provide these services during your last fiscal year?
 - O 0
 - o 1 10
 - o 11 25
 - o 26 50
 - o 51 100
 - 0 101 250
 - o 251 500
 - More than 500
 - If more than 500, how many? (round to the nearest 500)

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

| | Yes | s No | о |
|--|---------|------|---|
| (1) Do you participate in a <i>wrap fee program</i> ? | \odot | С | 5 |
| (2) If you participate in a wrap fee program, what is the amount of your regulatory assets under management attributable to acting as: | | | |

(a) sponsor to a wrap fee program

\$ O

Ι.

- (b) portfolio manager for a *wrap fee program*?\$ 487,530
- (c) sponsor to and portfolio manager for the same wrap fee program?
 \$ 0

If you report an amount in Item 5.1.(2)(c), do not report that amount in Item 5.1.(2)(a) or Item 5.1.(2)(b).

If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in Section 5.1.(2) of Schedule D.

If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2).

| | | Yes | No |
|----|---|---------|---------|
| J. | (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? | 0 | © |
| | (2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? | 0 | o |
| K. | Separately Managed Account Clients | Vos | 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>)? | © | 0 |
| | If yes, complete Section 5.K.(1) of Schedule D. | | |
| | (2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise? | 0 | \odot |
| | If yes, complete Section 5.K.(2) of Schedule D. | | |
| | (3) Do you engage in derivative transactions on behalf of any of the separately managed account clients that you advise? | 0 | \odot |
| | If yes, complete Section 5.K.(2) of Schedule D. | | |
| | (4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management? | o | 0 |
| | If yes, complete Section 5.K.(3) of Schedule D for each custodian. | | |
| L. | Marketing Activities | Yes | No |
| | (1) Do any of your <i>advertisements</i> include: | | |
| | (a) Performance results? | o | 0 |
| | (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? | 0 | \odot |
| | (c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))? | 0 | o |
| | (d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))? | 0 | o |
| | (e) Third-party ratings? | 0 | o |
| | (2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of <i>testimonials, endorsements</i> , or <i>third-party ratings</i> ? | 0 | 0 |
| | (3) Do any of your <i>advertisements</i> include <i>hypothetical performance</i> ? | \odot | 0 |
| | (4) Do any of your advertisements include predecessor performance? | 0 | o |
| | | | |

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

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

SEC File Number 811 - 22920

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

SECTION 5.1.(2) Wrap Fee Programs

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

Name of *Wrap Fee Program* MANAGER SELECT

Name of *Sponsor* LPL FINANCIAL LLC

Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-): 801 - 10970

Sponsor's CRD Number (if any): 6413

SECTION 5.K.(1) Separately Managed Accounts

After subtracting the amounts reported in Item 5.D.(3)(d)-(f) from your total regulatory assets under management, indicate the approximate percentage of this remaining amount attributable to each of the following categories of assets. If the remaining amount is at least \$10 billion in regulatory assets under management, complete Question (a). If the remaining amount is less than \$10 billion in regulatory assets under management, complete Question (b).

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

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date. Each column should add up to 100% and numbers should be rounded to the nearest percent.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

| Asse | et Type | Mid-year | End of year |
|--------|--|----------|-------------|
| (i) | Exchange-Traded Equity Securities | 4 % | 4 % |
| (ii) | Non Exchange-Traded Equity Securities | 0 % | 0 % |
| (iii) | U.S. Government/Agency Bonds | 12 % | 12 % |
| (iv) | U.S. State and Local Bonds | 11 % | 11 % |
| (v) | Sovereign Bonds | 0 % | 0 % |
| (vi) | Investment Grade Corporate Bonds | 66 % | 67 % |
| (vii) | Non-Investment Grade Corporate Bonds | 0 % | 0 % |
| (∨iii) | Derivatives | 0 % | 0 % |
| (ix) | Securities Issued by Registered Investment Companies or Business Development Companies | 0 % | 0 % |
| (x) | Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies) | 0 % | 0 % |
| (xi) | Cash and Cash Equivalents | 2 % | 2 % |
| (xii) | Other | 5 % | 4 % |

Generally describe any assets included in "Other"

INVESTMENTS IN PRIVATE PLACEMENTS AND PARTNERSHIPS.

| (b) | Asset Type | End of year |
|-----|--|-------------|
| | (i) Exchange-Traded Equity Securities | % |
| | (ii) Non Exchange-Traded Equity Securities | % |
| | (iii) U.S. Government/Agency Bonds | % |
| | (iv) U.S. State and Local Bonds | % |
| | (v) Sovereign Bonds | % |

| (vi) | Investment Grade Corporate Bonds | % |
|--------|---|---|
| (vii) | Non-Investment Grade Corporate Bonds | % |
| (∨iii) | Derivatives | % |
| (ix) | Securities Issued by Registered Investment Companies or Business Development Companies | % |
| (x) | Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies) | % |
| (xi) | Cash and Cash Equivalents | % |
| (xii) | Other | % |

Generally describe any assets included in "Other"

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

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

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

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

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

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

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

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

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

(i) Mid-Year

| Gross Notional Exposure | (1) Regulatory Assets Under Management | (2) Borrowings | | (3) | (3) Derivative Exposures | | | |
|----------------------------|---|-------------------|------------------------------------|---------------------------------------|--------------------------|---|-----------------------------|-------------------------|
| | | | (a) Interest Rate Derivative | (b) Foreign Exchange Derivative | (c) Credit Derivative | | (e) Commodity Derivative | (f) Other Derivative |
| Less than 10% | \$ | \$ | % | % | % | % | % | % |
| 10-149% | \$ | \$ | % | % | % | % | % | % |
| 150% or more | \$ | \$ | % | % | % | % | % | % |

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

(ii) End of Year

| Gross Notional Exposure | (1) Regulatory Assets Under Management | (2) Borrowings | | (3) | Derivative E | xposures | | |
|----------------------------|---|-------------------|------------------------------------|---------------------------------------|--------------------------|--------------------------|-----------------------------|-------------------------|
| | | | (a) Interest Rate Derivative | (b) Foreign Exchange Derivative | (c) Credit Derivative | (d) Equity Derivative | (e) Commodity Derivative | (f) Other Derivative |
| Less than 10% | \$ | \$ | % | % | % | % | % | % |
| 10-149% | \$ | \$ | % | % | % | % | % | % |
| 150% or more | \$ | \$ | % | % | % | % | % | % |

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which borrowings and derivatives are used in the

management of the separately managed accounts that you advise.

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

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

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

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

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

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

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

| SECTIO | N 5.K.(3) Custodians for Separa | itely Managed Accounts | | | | | | |
|--------|--|--|---|------------------------------------|--|--|--|--|
| | ete a separate Schedule D Section tory assets under management. | n 5.K.(3) for each custodian that holds ten pe | ercent or more of your aggregate separately n | nanaged account | | | | |
| (a) | Legal name of custodian: | | | | | | | |
| | BANK OF NEW YORK MELLON | | | | | | | |
| (b) | Primary business name of cu | stodian: | | | | | | |
| | BANK OF NEW YORK | | | | | | | |
| (C) | The location(s) of the custodi | an's office(s) responsible for <i>custody</i> of the a | ssets : | | | | | |
| | City: | State: | Country: | | | | | |
| | SYRACUSE | New York | United States | | | | | |
| | | | | Yes No | | | | |
| (d) | Is the custodian a related per | rson of your firm? | | 00 | | | | |
| (e) | If the custodian is a broker-d | ealer, provide its SEC registration number (if | any) | | | | | |
| (f) | - If the custodian is not a brok any) | er-dealer, or is a broker-dealer but does not | have an SEC registration number, provide its | <i>legal entity identifier</i> (if | | | | |
| | HPFHU00Q28E4N0NFVK49 | | | | | | | |
| (g) | What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? | | | | | | | |
| | \$ 22,169,358,857 | | | | | | | |
| | | | | | | | | |
| (a) | Legal name of custodian: | | | | | | | |
| | CIBC MELLON TRUST COMPAN | IY | | | | | | |
| (b) | Primary business name of cu | stodian: | | | | | | |
| | CIBC MELLON TRUST COMPAN | IY | | | | | | |
| (C) | The location(s) of the custodi | an's office(s) responsible for <i>custody</i> of the a | ssets : | | | | | |
| | City: TORONTO | State: | Country: Canada | | | | | |
| | | | | Yes No | | | | |
| (d) | Is the custodian a related per | rson of your firm? | | 00 | | | | |
| (e) | If the custodian is a broker-d | ealer, provide its SEC registration number (if | any) | | | | | |
| | - | | | | | | | |

| | (f) | If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if |
|---|-----|--|
| | | any) |
| | | 549300IYUUH221WBZ505 |
| | (g) | What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? |
| | | \$ 3,027,210,644 |
| L | | |

| Iter | n 6 O | other Business Activities | | |
|-----------------|--------|--|------|---------|
| In [·] | his It | em, we request information about your firm's other business activities. | | |
| A. | You | are actively engaged in business as a (check all that apply): broker-dealer (registered or unregistered) registered representative of a broker-dealer commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant real estate broker, dealer, or agent insurance broker or agent bank (including a separately identifiable department or division of a bank) trust company registered municipal advisor registered swap dealer major security-based swap participant accountant or accounting firm lawyer or law firm other financial product salesperson (specify): | | |
| | If yo | ou engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D. | Yes | No |
| B. | (1) | Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)? | 0 | \odot |
| | (2) | If yes, is this other business your primary business? | 0 | 0 |
| | | If "yes," describe this other business on Section 6.B. (2) of Schedule D, and if you engage in this business under a different name, provide that n | ame. | |
| | | | Yes | No |
| | (3) | Do you sell products or provide services other than investment advice to your advisory clients? | 0 | ⊙ |

If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.

SECTION 6.A. Names of Your Other Businesses

No Information Filed

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

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

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

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

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

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

Item 7 Financial Industry Affiliations

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

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

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

- (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)
- (2) other investment adviser (including financial planners)
- (3) registered municipal advisor
- (4) registered security-based swap dealer

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

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

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

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

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

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

SECTION 7.A. Financial Industry Affiliations

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

- 1. Legal Name of *Related Person*: KNIGHTS OF COLUMBUS
- 2. Primary Business Name of *Related Person*: KNIGHTS OF COLUMBUS
- 3. Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
 - or Other
- 4. Related Person's
 - (a) CRD Number (if any):
 - (b) CIK Number(s) (if any): CIK Number

- 5. *Related Person* is: (check all that apply)
 - (a) 🗖 broker-dealer, municipal securities dealer, or government securities broker or dealer
 - (b) 🔲 other investment adviser (including financial planners)
 - (c) 🗖 registered municipal advisor
 - (d) 🗖 registered security-based swap dealer
 - (e) 🗖 major security-based swap participant
 - (f) 🗖 commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
 - (g) 🗖 futures commission merchant
 - (h) 🗖 banking or thrift institution
 - (i) 🗖 trust company
 - (j) 🗖 accountant or accounting firm
 - (k) 🗖 lawyer or law firm
 - (I) 🗹 insurance company or agency
 - (m) pension consultant
 - (n) 🗖 real estate broker or dealer

| | (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles | | |
|-----|--|--------------------|---------|
| | (p) 🗖 sponsor, general partner, managing member (or equivalent) of pooled investment vehicles | Yes | No |
| 6. | Do you control or are you controlled by the related person? | $oldsymbol{\circ}$ | 0 |
| 7. | Are you and the <i>related person</i> under common <i>control</i> ? | \odot | 0 |
| 8. | (a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i>? (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i>' funds or securities that are maintained at the <i>related person</i>? (c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i>'s office responsible for <i>custody</i> of your <i>clients</i>' Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: | O O ' asse | |
| 9. | (a) If the related person is an investment adviser, is it exempt from registration? | | 0 |
| | (b) If the answer is yes, under what exemption? | | |
| 10. | (a) Is the related person registered with a foreign financial regulatory authority? | 0 | \odot |
| | (b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registe No Information Filed | red. | ~ |
| 11. | Do you and the related person share any supervised persons? | \odot | 0 |
| 12. | Do you and the <i>related person</i> share the same physical location? | o | 0 |
| | Legal Name of <i>Related Person</i> : KOCAA PRIVATE CREDIT FUND GP LLC Primary Business Name of <i>Related Person</i> : KOCAA PRIVATE CREDIT FUND GP LLC | | |
| 3. | <i>Related Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - | | |
| | or Other | | |
| 4. | Related Person's (a) CRD Number (if any): | | |
| | (b) CIK Number(s) (if any): | | |
| | No Information Filed | | |
| 5. | Related Person is: (check all that apply) (a) broker-dealer, municipal securities dealer, or government securities broker or dealer (b) other investment adviser (including financial planners) (c) registered municipal advisor (d) registered security-based swap dealer (e) major security-based swap participant (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) futures commission merchant (h) banking or thrift institution (i) trust company (j) accountant or accounting firm (k) lawyer or law firm (i) pension consultant (n) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles | Yes | No |
| 6. | Do you <i>control</i> or are you <i>controlled</i> by the <i>related person</i> ? | | 0 |

7. Are you and the *related person* under common *control*?

 \odot \circ

| 8. | (a) | Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients? | 0 | \odot |
|--|-------------|--|---------|---------|
| (b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i>' funds or securities that are maintained at the <i>related person</i>? (c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i>'s office responsible for <i>custody</i> of your <i>clients</i>' ass | | | | |
| | (C) | If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' | asse | ets: |
| | | Number and Street 1:Number and Street 2: | | |
| | | City: State: Country: ZIP+4/Postal Code: | | |
| | | If this address is a private residence, check this box: \Box | /es | No |
| 9. | (a) | If the <i>related person</i> is an investment adviser, is it exempt from registration? | 0 | |
| | | If the answer is yes, under what exemption? | · | ~ |
| | | | | |
| 10. | (a) | Is the related person registered with a foreign financial regulatory authority? | 0 | \odot |
| | (b) | If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is register | ed. | |
| 11 | Dov | No Information Filed ou and the <i>related person</i> share any <i>supervised persons</i> ? | _ | - |
| 11. | D0 y | ou and the related person share any supervised persons? | O | 0 |
| 12. | Do y | ou and the <i>related person</i> share the same physical location? | o | 0 |
| | | | 0 | ~ |
| | | | | _ |
| 1 | Loga | Name of <i>Related Person</i> : | | |
| Ι. | - | HTS OF COLUMBUS LONG/SHORT EQUITY FUND GP, LLC | | |
| | | | | |
| 2. | | ary Business Name of <i>Related Person</i> : | | |
| | KNIG | HTS OF COLUMBUS LONG/SHORT EQUITY FUND GP, LLC | | |
| 3. | Relat | red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) | | |
| | - | | | |
| | or Oth a | | | |
| | Othe | | | |
| 4. | Relat | red Person's | | |
| | (a) | CRD Number (if any): | | |
| | (h) | CIK Number(s) (if any): | | |
| | (b) | No Information Filed | | |
| | | | | |
| _ | | | | |
| 5. | | ed Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer | | |
| | | blocker-dealer, multicipal securities dealer, or government securities blocker of dealer other investment adviser (including financial planners) | | |
| | • • | registered municipal advisor | | |
| | (d) | registered security-based swap dealer | | |
| | (e) | major security-based swap participant | | |
| | () | commodity pool operator or commodity trading advisor (whether registered or exempt from registration) | | |
| | (0) | futures commission merchant banking or thrift institution | | |
| | () | trust company | | |
| | (j) | accountant or accounting firm | | |
| | (k) | lawyer or law firm | | |
| | () | insurance company or agency | | |
| | | pension consultant real estate broker or dealer | | |
| | () | sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles | | |
| | | sponsor, general partner, managing member (or equivalent) of pooled investment vehicles | | |
| | | | /es | No |
| 6. | Do y | ou control or are you controlled by the related person? | \odot | \circ |
| - | | | | |
| 1. | Are y | you and the <i>related person</i> under common <i>control</i> ? | 0 | 0 |
| 8. | (a) | Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients? | ~ | |
| υ. | | If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the | 0 | \odot |
| | | presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ? | 0 | 0 |

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

| | | Number and Street 1: N | umber and Street 2: | | |
|-----|--|---|---|-----|--------|
| | | City: State: Co If this address is a private residence, check this box: | ountry: ZIP+4/Postal Code: | ~ • | No |
| 9. | (a) | If the <i>related person</i> is an investment adviser, is it exempt from re | | | 0 |
| | (b) | If the answer is yes, under what exemption? | | | |
| 10. | (a) | Is the related person registered with a foreign financial regulatory a | uthority? | | • |
| | (b) | | <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. Information Filed | | |
| 11. | Do y | ou and the <i>related person</i> share any <i>supervised persons</i> ? | ۲ | | 0 |
| 12. | Do yo | ou and the <i>related person</i> share the same physical location? | • | | 0 |
| 1. | • | Name of <i>Related Person</i> : HTS OF COLUMBUS COMMINGLED FUND MANAGER LLC | | | |
| 2. | | ary Business Name of <i>Related Person</i> : HTS OF COLUMBUS COMMINGLED FUND MANAGER LLC | | | |
| 3. | Relat | ed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) | | | |
| | or Othe | r | | | |
| 4. | | ed Person's | | | |
| | | CRD Number (if any): | | | |
| | (b) | CIK Number(s) (if any): No | o Information Filed | | |
| | | | | | |
| | (a) (b) (c) (d) (e) (f) (g) (h) (l) (l) (m) (n) (o) (p) | other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whet futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), sponsor, general partner, managing member (or equivalent) | her registered or exempt from registration) excluding pooled investment vehicles | s ſ | No |
| 6. | Do yo | ou control or are you controlled by the related person? | \odot | | 0 |
| 7. | Are y | you and the related person under common control? | © | | 0 |
| 8. | (b) | | swered "yes," to question 8.(a) above, have you overcome the t to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not securities that are maintained at the <i>related person</i> ? location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> ass | I | • • |
| | | | umber and Street 2: ountry: ZIP+4/Postal Code: | | |
| | | | Yes | s ľ | ١o |
| 9. | | If the <i>related person</i> is an investment adviser, is it exempt from re | gistration? O | | 0 |
| | (b) | If the answer is yes, under what exemption? | | | |

| 10 | . (a) | Is the related person registered with a foreign financial regulatory authority? | 0 | \odot |
|-----|--------|---|-----|---------|
| | (b) | If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registere No Information Filed | ed. | |
| 11 | . Do y | you and the <i>related person</i> share any <i>supervised persons</i> ? | 0 | 0 |
| 12 | . Do y | you and the <i>related person</i> share the same physical location? | • | 0 |
| | | | | |
| Ite | m 7 F | Private Fund Reporting | | |

B. Are you an adviser to any private fund?

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

Yes No

⊙ ○

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

| | Funds per Page: 15 💌 Total Funds: 9 | | |
|------|---|-----|---|
| | | | |
| λ. P | RIVATE FUND | | |
| nfo | rmation About the Private Fund | | |
| 1. | (a) Name of the <i>private fund</i> : | | |
| | KNIGHTS OF COLUMBUS COMMINGLED FUNDS LLC - KNIGHTS OF COLUMBUS CASH MANAGEMENT FUND | | |
| | (b) Private fund identification number: | | |
| | (include the "805-" prefix also) | | |
| | 805-3066285498 | | |
| | | | |
| 2. | Under the laws of what state or country is the private fund organized: | | |
| | State: Country: | | |
| | Delaware United States | | |
| 2 | (a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): | | |
| 3. | Name of General Partner, Manager, Trustee, or Director | | |
| | KNIGHTS OF COLUMBUS COMMINGLED FUND MANAGER LLC | | |
| | | | |
| | (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. | | |
| | No Information Filed | | |
| | | | |
| 4. | The private fund (check all that apply; you must check at least one): | | |
| | (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 | | |
| | (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 | | |
| 5. | List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. | | |
| | No Information Filed | | |
| | | Yes | N |
| 6. | (a) Is this a "master fund" in a master-feeder arrangement? | 0 | 6 |
| | (b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? | | _ |
| | No Information Filed | | |

| | | Yes | No |
|-----------|--|---------|---------|
| | (c) Is this a "feeder fund" in a master-feeder arrangement? | \circ | \odot |
| | (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? | | |
| | Name of <i>private fund</i> : | | |
| | | | |
| | Private fund identification number: | | |
| | (include the "805-" prefix also) | | |
| | | | |
| | NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section | 7.B.(* | 1) |
| | for the master-feeder arrangement or reporting on the funds separately. | | |
| | | | |
| 7. | If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: | each | n of |
| | | | |
| | | | |
| | No Information Filed | | |
| | | | |
| | | | |
| | NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is multiple alagges (or parise) of charge or interests, and each class (or parise) invests substantially all efficiency of charge or interests, and each class (or parise) invests substantially all efficiency of the provide the substantial of the provide the substantial of the provident of the provide | | |
| | multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. | Yes | No |
| 0 | (a) Is this <i>private fund</i> a "fund of funds"? | | |
| 8. | | 0 | \odot |
| | NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | | |
| | (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? | 0 | 0 |
| | | 0 | 0 |
| | | | NI- |
| 9. | During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment | Yes | |
| 7. | Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? | 0 | \odot |
| | | | |
| 10. | What type of fund is the <i>private fund</i> ? | | |
| | O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other privat | t≏ fun | d |
| | COMMINGLED FUND | c run | u. |
| | | | |
| | NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. | | |
| | | | |
| 11. | Current gross asset value of the private fund: | | |
| | \$ O | | |
| | | | |
| <u>Ow</u> | <u>nership</u> | | |
| 10 | | | |
| 12. | Minimum investment commitment required of an investor in the <i>private fund</i> : | | |
| | \$ 0 | | |
| | NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund). | | |
| | | | |
| 13. | Approximate number of the <i>private fund's</i> beneficial owners: | | |
| | 0 | | |
| | | | |
| 14. | What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : | | |
| | 0% | | |
| | | | |
| 15. | (a) What is the approximate percentage of the private fund beneficially owned (in the aggregate) by funds of funds: | | |
| | 0% | | |
| | | Yes | No |
| | (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment | 0 | 0 |
| | Company Act of 1940, are sales of the fund limited to qualified clients? | | |

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:0%

| 7. (a | | Yes | No |
|---------------|---|-----------------------------------|--------------------------|
| |) Are you a subadviser to this <i>private fund</i> ? | 0 | |
| (b |) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer question 17.(a) is "no," leave this question blank. | ~ | Č |
| | No Information Filed | | - |
| | | Yes | No |
| 8. (a |) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund? | 0 | \odot |
| (b |) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank. | answ | /er |
| | No Information Filed | | |
| • • | | Yes | No |
| | e your <i>clients</i> solicited to invest in the <i>private fund</i> ? | 0 | \odot |
| NC | DTE: For purposes of this question, do not consider feeder funds of the private fund. | | |
| 0. Ap 09 | proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? % | | |
| rivat | e Offering | | |
| 1. Ha | as the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? | Yes © | No |
| 2. If | yes, provide the <i>private fund's</i> Form D file number (if any): | | |
| F | orm D file number | | |
| | 21-277683 | | |
| 3. (a |) (1) Are the <i>private fund's</i> financial statements subject to an annual audit? | Yes O | No O |
| | (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? | 0 | 0 |
| | If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. | յ firm | ١, |
| | No Information Filed | | |
| | | | |
| | | Yes | No |
| (g |) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors? | Yes | _ |
| (g (h | | 0 | С |
| (g (h | investors? | 0 | С |
| (g (h | investors?) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified op | O inion: | c s? |
| | investors?) Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified op • Yes • No • Report Not Yet Received | o inion: availa | C s? able. |
| Prime | investors? Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified op Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is a | O inion: availa Yes | C able. |
| Prime | investors? Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified op Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is a Broker | O inion: availa Yes O | C s? able. S No |
| Prime | investors? Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contain unqualified op Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report is a Broker Does the <i>private fund</i> use one or more prime brokers? If the answer to question 24. (a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If the | O inion: availa Yes O | s? sble N |

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

| Additional Custodian II | nformation : 1 Record(s) Filed | | | |
|---|--|---|---|-------------------------------|
| - | · · · | • | gh g) below for each custodian the <i>priv</i> rough (g) separately for each custodian | |
| (b) Legal name of cus BROWN BROTHERS | todian: 5 HARRIMAN AND COMPANY | | | |
| (c) Primary business r BROWN BROTHERS | name of custodian: 5 HARRIMAN AND COMPANY | | | |
| (d) The location of the | e custodian's office responsible f | for <i>custody</i> of the p | <i>rivate fund's</i> assets (city, state and cour | ntry): |
| City: | State: | | Country: | |
| BOSTON | Massachusetts | | United States | |
| (e) Is the custodian a | related person of your firm? | | | |
| (f) If the custodian is | a broker-dealer, provide its SEC | C registration numb | er (if anv): | |
| - | | | | |
| CRD Number (if an | y): | | | |
| (g) If the custodian is <i>identifier</i> (if any) | not a broker-dealer, or is a bro | ker-dealer but doe | s not have an SEC registration number, | provide its <i>legal enti</i> |
| | | | | |
| 5493006KMX1VFT | | | | |
| 5493006KMX1VFT rator Does the <i>private fund</i> use f the answer to question | e an administrator other than yo n 26.(a) is "yes," respond to que | estions (b) through | (f) below. If the <i>private fund</i> uses more | e than one administra |
| 5493006KMX1VFT rator Does the <i>private fund</i> use f the answer to questions nust complete questions | e an administrator other than yo | estions (b) through each administrator. | • | e than one administra |
| 5493006KMX1VFT rator Does the <i>private fund</i> use f the answer to question nust complete questions Additional Administrate If the answer to quest | e an administrator other than yo n 26.(a) is "yes," respond to que s (b) through (f) separately for e or Information : 1 Record(s) F ion 26.(a) is "yes," respond to c st complete questions (b) throug | estions (b) through each administrator. iled. questions (b) throug | gh (f) below. If the <i>private fund</i> uses mo | |
| 5493006KMX1VFT rator Does the <i>private fund</i> use f the answer to question nust complete questions Additional Administrate If the answer to questi administrator, you mus (b) Name of administr SEI ARCHWAY | e an administrator other than yo n 26.(a) is "yes," respond to que s (b) through (f) separately for e or Information : 1 Record(s) F ion 26.(a) is "yes," respond to c st complete questions (b) throug ator: | estions (b) through each administrator. iled. questions (b) throug gh (f) separately fo | gh (f) below. If the <i>private fund</i> uses mo | |
| 5493006KMX1VFT rator Does the private fund use f the answer to question ust complete questions Additional Administrate If the answer to questi administrator, you mus (b) Name of administr SEI ARCHWAY (c) Location of admini | e an administrator other than yo n 26.(a) is "yes," respond to que s (b) through (f) separately for e or Information : 1 Record(s) F ion 26.(a) is "yes," respond to c st complete questions (b) throug | estions (b) through each administrator. iled. questions (b) throug gh (f) separately fo | gh (f) below. If the <i>private fund</i> uses mo r each administrator. | |
| 5493006KMX1VFT rator Does the <i>private fund</i> use f the answer to question nust complete questions Additional Administrate If the answer to questi administrator, you mus (b) Name of administr SEI ARCHWAY | e an administrator other than yo n 26.(a) is "yes," respond to que s (b) through (f) separately for e or Information : 1 Record(s) F ion 26.(a) is "yes," respond to c st complete questions (b) throug ator: | estions (b) through each administrator. iled. questions (b) throug gh (f) separately fo | gh (f) below. If the <i>private fund</i> uses mo | |
| 5493006KMX1VFT rator Does the <i>private fund</i> use f the answer to question nust complete questions Additional Administrate If the answer to questi administrator, you mus (b) Name of administr SEI ARCHWAY (c) Location of admini City: INDIANAPOLIS | e an administrator other than yo n 26. (a) is "yes," respond to que s (b) through (f) separately for e or Information : 1 Record(s) F ion 26. (a) is "yes," respond to c st complete questions (b) throug ator: strator (city, state and country) | estions (b) through each administrator. iled. questions (b) throug gh (f) separately fo : State: | gh (f) below. If the <i>private fund</i> uses mo r each administrator. Country: | ore than one Ye |
| 5493006KMX1VFT rator Does the <i>private fund</i> use f the answer to question nust complete questions Additional Administrate If the answer to questi administrator, you mus (b) Name of administr SEI ARCHWAY (c) Location of admini City: INDIANAPOLIS | e an administrator other than yo n 26.(a) is "yes," respond to que s (b) through (f) separately for e or Information : 1 Record(s) F ion 26.(a) is "yes," respond to c st complete questions (b) throug ator: | estions (b) through each administrator. iled. questions (b) throug gh (f) separately fo : State: | gh (f) below. If the <i>private fund</i> uses mo r each administrator. Country: | ore than one |
| 5493006KMX1VFT rator Does the private fund use f the answer to question nust complete questions Additional Administrate If the answer to questi administrator, you must (b) Name of administr SEI ARCHWAY (c) Location of admini City: INDIANAPOLIS (d) Is the administrate (e) Does the administ | e an administrator other than yo n 26. (a) is "yes," respond to que s (b) through (f) separately for e or Information : 1 Record(s) F ion 26. (a) is "yes," respond to c st complete questions (b) throug ator: ator: strator (city, state and country) or a <i>related person</i> of your firm? rator prepare and send investor | estions (b) through each administrator. iled. questions (b) throug gh (f) separately fo : State: Indiana r account statemen | gh (f) below. If the <i>private fund</i> uses mo r each administrator. Country: | ore than one Ye |

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

0%

| | | evant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (includ cations) was the valuation determined by such <i>person</i> . | ing | |
|-------------|-------|--|-------------------|---------|
| Ma | rkete | ers | Maa | NI- |
| 28. | (a) | Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes? | Yes | |
| 20. | (a) | You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicito | O r or | \odot |
| | | similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer. | | |
| | | | | |
| | | No Information Filed | | |
| | | | | |
| A. Pl | RIVA | TE FUND | | |
| <u>Info</u> | ormat | tion About the Private Fund | | |
| 1. | (a) | Name of the <i>private fund</i> : | | |
| | | KNIGHTS OF COLUMBUS COMMINGLED FUNDS LLC - KNIGHTS OF COLUMBUS COMMINGLED CORE BOND FUND | | |
| | (b) | Private fund identification number: | | |
| | | (include the "805-" prefix also) | | |
| | | 805-6203051480 | | |
| 2 | Unc | der the laws of what state or country is the <i>private fund</i> organized: | | |
| ۷. | one | State: Country: | | |
| | | Delaware United States | | |
| 0 | (-) | | | |
| 3. | | Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): | | |
| | | me of General Partner, Manager, Trustee, or Director IGHTS OF COLUMBUS COMMINGLED FUND MANAGER LLC | | |
| | | | |] |
| | (b) | If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. | | |
| | | No Information Filed | | |
| | | | | |
| 4. | The | e private fund (check all that apply; you must check at least one): | | |
| | | (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 | | |
| 5. | List | the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. | | |
| | | No Information Filed | | |
| | | | Yes | No |
| 6. | (a) | Is this a "master fund" in a master-feeder arrangement? | 0 | \odot |
| | (b) | If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund? | | |
| | | No Information Filed | | |
| | | | Yes | No |
| | (c) | Is this a "feeder fund" in a master-feeder arrangement? | 0 | o |
| | (d) | If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? | | |
| | | Name of <i>private fund</i> : | | |
| | | Private fund identification number: | | |
| | | (include the "805-" prefix also) | | |
| | | | | |
| | | TE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section the master-feeder arrangement or reporting on the funds separately. | 7.B.(1 | 1) |
| 7. | • | ou are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for feeder funds answer the following questions: | ⁻ each | ı of |

No Information Filed

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

| | | Yes | No |
|------------|---|---------|---------|
| 8. | (a) Is this <i>private fund</i> a "fund of funds"? | 0 | \odot |
| | NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investmen vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | t | |
| | (b) If yes, does the private fund invest in funds managed by you or by a related person? | 0 | 0 |
| | | Yes | No |
| 9. | During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? | 0 | • |
| 10. | What type of fund is the <i>private fund</i> ? | | |
| | O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund ⊙ Other priva COMMINGLED FUND | te fur | nd: |
| | NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. | | |
| 11. | Current gross asset value of the <i>private fund</i> : \$ 53,630,924 | | |
| <u>Ow</u> | nership | | |
| 12. | Minimum investment commitment required of an investor in the private fund: | | |
| | \$ O | | |
| | NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund). | Ģ | |
| 13. | Approximate number of the <i>private fund's</i> beneficial owners: 11 | | |
| 14. | What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0% | | |
| 15. | (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: | | |
| | 0% | Yes | No |
| | (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ? | 0 | 0 |
| 16. | What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0% | | |
| <u>Yoı</u> | Ir Advisory Services | | |
| 17 | (a) Are you a subadvisor to this private fund | Yes | |
| 17. | (a) Are you a subadviser to this <i>private fund</i>?(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i>. If the answer | С to | o |
| | question 17.(a) is "no," leave this question blank. | | |
| | No Information Filed | | |
| | | Yes | No |
| 18. | (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i>?(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i>. If the | 0 | \odot |

No Information Filed

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

Yes No

| 19. | Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? | 0 | \odot |
|-------------|--|-----------------------|---------|
| | NOTE: For purposes of this question, do not consider feeder funds of the private fund. | | |
| 20. | Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 1% | | |
| <u>Priv</u> | vate Offering | | |
| | | Yes | s No |
| 21. | Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? | \odot | 0 |
| 22. | If yes, provide the <i>private fund's</i> Form D file number (if any): | | |
| | Form D file number | | |
| | 021-271617 | | |
| B. SI | ERVICE PROVIDERS | | |
| Auc | ditors | | |
| | | Ye | s No |
| 23. | (a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit? | \odot | 0 |
| | (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? | \odot | 0 |
| | If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one aud you must complete questions (b) through (f) separately for each auditing firm. | iting firr | m, |
| | Additional Auditor Information : 1 Record(s) Filed. | | |
| | If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. | | |
| | (b) Name of the auditing firm: SPICER JEFFRIES LLP | | |
| | (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): | | |
| | City: State: Country: | | |
| | DENVER Colorado United States | Yes | No |
| | (d) Is the auditing firm an independent public accountant? | © | 0 |
| | (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? | \odot | 0 |
| | If yes, Public Company Accounting Oversight Board-Assigned Number: | | |
| | 349 | | |
| | (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? | ٥ | 0 |
| | | Ye | s No |
| | (g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors? | o | 0 |
| | (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified | 1 opinior | ns? |
| | | | |
| | If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the repor | t is avai | lable. |
| <u>Prir</u> | me Broker | | |
| ٦ <i>١</i> | (a) Does the <i>private fund</i> use one or more prime brokers? | | s No |
| ∠4. | (a) Does the <i>private rund</i> use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If <i>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker. | C the <i>pri</i> v | _ |
| | No Information Filed | | |

Custodian

| 25 | (a) | Does the private | <i>fund</i> use anv | v custodians | (including t | the nrime brok | ers listed | ahove) tr | n hold some a | or all of its assets? |
|-----|-----|------------------|---------------------|--------------|--------------|-----------------|--------------|-----------|---------------|-----------------------|
| 20. | (u) | Does the private | | y custouruns | (including | the printe brok | lors instour | | | |

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

| | | · · · · · |) through g) below for each custodian the <i>privat</i> (b) through (g) separately for each custodian. | <i>e fund</i> uses. If the <i>privat</i> |
|-----|---|---|---|--|
| b) | Legal name of cus BROWN BROTHERS | odian: HARRIMAN AND COMPANY | | |
| c) | Primary business r BROWN BROTHERS | ame of custodian: HARRIMAN AND COMPANY | | |
| (d) | The location of the | custodian's office responsible for <i>custody</i> c | f the <i>private fund's</i> assets (city, state and count | ry): |
| | City: | State: | Country: | |
| | BOSTON | Massachusetts | United States | |
| | | | | Yes I |
| e) | Is the custodian a | related person of your firm? | | 0 |
| (f) | If the custodian is | a broker-dealer, provide its SEC registratior | n number (if any): | |
| | - | | | |
| | CRD Number (if any | <i>(</i>): | | |
| (g) | If the custodian is <i>identifier</i> (if any) | not a broker-dealer, or is a broker-dealer b | out does not have an SEC registration number, p | rovide its <i>legal entity</i> |
| | 5493006KMX1VFT | PYPW14 | | |

Administrator

| | | | Yes | N | lo |
|-----|-----|---|---------|-----|----|
| 26. | (a) | Does the private fund use an administrator other than your firm? | \odot | ¢ | С |
| | | If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrat must complete questions (b) through (f) separately for each administrator. | or, y | 'ou | I |

| Additional Administrator Information | 1: 1 Record(s) Filed. | | |
|---|-----------------------|---|---------------|
| If the answer to question 26.(a) is "y administrator, you must complete qu | • • • • • | igh (f) below. If the <i>private fund</i> uses r or each administrator. | nore than one |
| (b) Name of administrator: | | | |
| SEI ARCHWAY | | | |
| (c) Location of administrator (city, st City: | State: | Country: | |
| INDIANAPOLIS | Indiana | United States | Y N |
| (d) Is the administrator a <i>related per</i> | son of your firm? | | Yes No |
| (e) Does the administrator prepare a • Yes (provided to all investors) | | nts to the <i>private fund's</i> investors? all investors) ONo (provided to no in | ivestors) |
| • • | | nvestor account statements to the (res of the) <i>private fund's</i> investors, respon | · · |

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

100%

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

Marketers

Yes No

 \odot

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

No Information Filed

A. PRIVATE FUND

Information About the Private Fund

1. (a) Name of the private fund:

KNIGHTS OF COLUMBUS COMMINGLED FUNDS LLC - KNIGHTS OF COLUMBUS COMMINGLED INTERNATIONAL EQUITY FUND

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

(b) Private fund identification number: (include the "805-" prefix also) 805-6146368555

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

| State: | Country: |
|----------|---------------|
| Delaware | United States |

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

Name of General Partner, Manager, Trustee, or Director KNIGHTS OF COLUMBUS COMMINGLED FUND MANAGER LLC

(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.

No Information Filed

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

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

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

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

| | No Information Filed | | |
|----|---|-----|---------|
| | | Yes | No |
| 6. | (a) Is this a "master fund" in a master-feeder arrangement? | 0 | \odot |
| | (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund? | | |
| | No Information Filed | | |
| | | Yes | No |
| | (c) Is this a "feeder fund" in a master-feeder arrangement? | 0 | \odot |
| | (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? | | |

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

Name of private fund:

| | 7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section feeder funds answer the following questions: | If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for each of the feeder funds answer the following questions: | | | | | | | |
|-----------|--|--|--|--|--|--|--|--|--|
| | No Information Filed | | | | | | | | |
| | NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all of assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of t multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single | this question if it issued | | | | | | | |
| | | Yes No | | | | | | | |
| 8. | | 00 | | | | | | | |
| | NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other p vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | ooled investment | | | | | | | |
| | (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? | 0 0 | | | | | | | |
| | | 0.0 | | | | | | | |
| | | Yes No | | | | | | | |
| 9. | During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Ir Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? | nvestment O C | | | | | | | |
| 10. | 10. What type of fund is the <i>private fund</i> ? | | | | | | | | |
| | ○ hedge fund ○ liquidity fund ○ private equity fund ○ real estate fund ○ securitized asset fund ○ venture capital fun COMMINGLED FUND | nd 💿 Other <i>private fund</i> : | | | | | | | |
| | NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. | | | | | | | | |
| 11. | 11. Current gross asset value of the <i>private fund</i>:\$ 0 | | | | | | | | |
| <u>0w</u> | Ownership | | | | | | | | |
| 12. | 12. Minimum investment commitment required of an investor in the <i>private fund</i>:\$ 0 | | | | | | | | |
| | NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amoun organizational documents of the fund). | nt set forth in the | | | | | | | |
| 13. | 13. Approximate number of the <i>private fund's</i> beneficial owners:0 | | | | | | | | |
| 14. | What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i>: 0% | | | | | | | | |
| 15. | 15. (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0% | | | | | | | | |
| | (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Inv | Yes No | | | | | | | |
| | Company Act of 1940, are sales of the fund limited to qualified clients? | | | | | | | | |
| | 16. What is the approximate percentage of the private fund beneficially owned by non-United States persons: | | | | | | | | |
| 16. | 0% | | | | | | | | |
| | 0% Your Advisory Services | Voc M | | | | | | | |
| <u>Yo</u> | | Yes No | | | | | | | |

18. (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?

0.0

| |) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the answer to question 18.(a) is "no," leave this question blank. | | | | | | | |
|--------------|---|-----------------------------------|--|--|--|--|--|--|
| | No Information Filed | | | | | | | |
| | | Yes No | | | | | | |
| 19. | . Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? | 00 | | | | | | |
| | NOTE: For purposes of this question, do not consider feeder funds of the private fund. | | | | | | | |
| 20. | . Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0% | | | | | | | |
| <u>Pri</u> \ | ivate Offering | | | | | | | |
| | | Yes No | | | | | | |
| 21. | . Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities | Act of 1933? • • • | | | | | | |
| 22. | . If yes, provide the <i>private fund's</i> Form D file number (if any): | | | | | | | |
| | Form D file number 021-277677 | | | | | | | |
| 3. SI | SERVICE PROVIDERS | | | | | | | |
| Aud | ditors | | | | | | | |
| | | Yes No | | | | | | |
| 23. | . (a) (1) Are the private fund's financial statements subject to an annual audit? | 00 | | | | | | |
| | (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAA | ιP? Ο Ο | | | | | | |
| | If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one you must complete questions (b) through (f) separately for each auditing firm. | | | | | | | |
| | No Information Filed | | | | | | | |
| | | Yes No | | | | | | |
| | (g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>pri</i> investors? | ivate fund's O O | | | | | | |
| | (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment of | ontain unqualified opinions? | | | | | | |
| | ○ Yes ○ No ○ Report Not Yet Received | | | | | | | |
| | If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your respor | ise when the report is available. | | | | | | |
| <u>Prir</u> | ime Broker | Yes No | | | | | | |
| 24. | . (a) Does the <i>private fund</i> use one or more prime brokers? | 0.0 | | | | | | |
| | If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the pr fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime bro | ivate fund uses. If the private | | | | | | |
| | No Information Filed | | | | | | | |
| | | | | | | | | |
| <u>Cus</u> | stodian | Yes No | | | | | | |
| 25. | . (a) Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its asset | | | | | | | |
| | If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>priva fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. | te fund uses. If the private | | | | | | |
| | Additional Custodian Information : 1 Record(s) Filed. | | | | | | | |
| | If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>priv fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian | | | | | | | |

(b) Legal name of custodian:

| | | BROWN BROTHERS H | ARRIMAN AND COMPANY | | | |
|--------------------------|--|---|--|-------------------------------|--|--|
| | (c) | Primary business nar BROWN BROTHERS H | ne of custodian: ARRIMAN AND COMPANY | | | |
| | (d) | The location of the c | ustodian's office responsi | ble for <i>custody</i> of the | private fund's assets (city, state and country): | |
| | | City: | State: | | Country: | |
| | | BOSTON | Massachusetts | | United States | |
| | (e) | Is the custodian a re | lated person of your firm? | | | Yes No |
| | (f) | If the custodian is a | oroker-dealer, provide its | SEC registration num | ber (if any): | |
| | | CRD Number (if any): | | | | |
| | (g) | If the custodian is no <i>identifier</i> (if any) | ot a broker-dealer, or is a | ı broker-dealer but do | es not have an SEC registration number, provide | its <i>legal entity</i> |
| | | 5493006KMX1VFTPY | PW14 | | | |
| <u>Admini</u> 26. (a) |) Does If the | the <i>private fund</i> use a e answer to question 2 | n administrator other tha 6.(a) is "yes," respond to 5) through (f) separately | o questions (b) throug | h (f) below. If the <i>private fund</i> uses more than on | Yes No © O ne administrator, you |
| | | | | | · | |
| | Addi | tional Administrator | Information : 1 Record(| s) Filed. | | |
| | adr | • | complete questions (b) th | • | ugh (f) below. If the <i>private fund</i> uses more than for each administrator. | one |
| | | | | | | |
| | (c) | Location of administr | ator (city, state and cour | ntry): | | |
| | | City: | | State: | Country: | |
| | | INDIANAPOLIS | | Indiana | United States | |
| | | le the educiriet states | a related person of your fi | | | Yes No |
| | (a) | is the administrator | a <i>related person</i> of your fi | rm <i>:</i> | | 00 |
| | (e) | | | | ents to the <i>private fund's</i> investors? t all investors) \bigcirc No (provided to no investors) | |
| | (f) | • | | | investor account statements to the (rest of the) p of the) <i>private fund's</i> investors, respond "not appl | |
| yo 0% Inc rel | ur <i>relat</i> 6 clude o evant o | ted person? nly those assets wher quotes, and (ii) the va | e (i) such <i>person</i> carried | out the valuation pro- | value) was valued by a <i>person</i> , such as an adminis cedure established for that asset, if any, including ions, redemptions or distributions, and fee calcula | obtaining any |
| Market | ters | | | | | |
| aa (` | | | | - 41 41 | | Yes No |
| ∠ŏ. (a) | | | | | employees for marketing purposes? | |
| | rour | nusranswer ves Wh | erner me <i>person</i> acts as | a placement adent co | onsultant, finder, introducer, municipal advisor or | OTHER SOUCIEOF. OF |

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

| | E FUND | | |
|---|---|--|---------------|
| | | | |
| ormati | on About the Private Fund | | |
| ŀ | | - KNIGHTS OF COLUMBUS COMMINGLED LARGE CAP GROWTH FUND | |
| (| <i>Private fund</i> identification number: (include the "805-" prefix also) 805-9930807317 | | |
| Unde | er the laws of what state or country is the <i>private</i> | fund organized: | |
| | State: Delaware | Country: United States | |
| | • | Directors (or <i>persons</i> serving in a similar capacity): | |
| | ne of General Partner, Manager, Trustee, or Dire GHTS OF COLUMBUS COMMINGLED FUND MANAGE | | |
| | | | |
| (b) I | If filing an umbrella registration, identify the filing a | dviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. | |
| | | No Information Filed | |
| List 1 | | | |
| | the name and country, in English, of each <i>foreign f</i> | financial regulatory authority with which the private fund is registered. No Information Filed | |
| | the name and country, in English, of each <i>foreign f</i> | | Yes I |
| (a) I | Is this a "master fund" in a master-feeder arrange | No Information Filed | - |
| (a) I | Is this a "master fund" in a master-feeder arrange | No Information Filed ement? ation number (if any) of the feeder funds investing in this <i>private fund</i> ? | - |
| (a) I | Is this a "master fund" in a master-feeder arrange | No Information Filed | - |
| (a) (b) | Is this a "master fund" in a master-feeder arrange If yes, what is the name and <i>private fund</i> identifica | No Information Filed ement? ation number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed | 0 |
| (a) (b) (c) (d) | Is this a "master fund" in a master-feeder arrange If yes, what is the name and <i>private fund</i> identifica Is this a "feeder fund" in a master-feeder arrange | No Information Filed ement? ation number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed | - |
| (a) (b) (c) (d) | Is this a "master fund" in a master-feeder arrange If yes, what is the name and <i>private fund</i> identifica Is this a "feeder fund" in a master-feeder arrange If yes, what is the name and <i>private fund</i> identifica | No Information Filed ement? ation number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed | 0 |
| (a) (b) (c) (d) (d) (d) | Is this a "master fund" in a master-feeder arrange If yes, what is the name and <i>private fund</i> identifica Is this a "feeder fund" in a master-feeder arrange If yes, what is the name and <i>private fund</i> identifica Name of <i>private fund</i> : <i>Private fund</i> identification number: (include the "805-" prefix also) | No Information Filed ement? ation number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed ement? ation number (if any) of the master fund in which this <i>private fund</i> invests? | O Yes O |
| (a) (b) (c) (d) (d) | Is this a "master fund" in a master-feeder arrange If yes, what is the name and <i>private fund</i> identifica Is this a "feeder fund" in a master-feeder arrange If yes, what is the name and <i>private fund</i> identifica Name of <i>private fund</i> : <i>Private fund</i> identification number: (include the "805-" prefix also) E: You must complete question 6 for each master- he master-feeder arrangement or reporting on the | No Information Filed ement? ation number (if any) of the feeder funds investing in this <i>private fund</i> ? No Information Filed ement? ation number (if any) of the master fund in which this <i>private fund</i> invests? | Yes O |

| | NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investmer vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | t | |
|------------|---|-----------|----------|
| | (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? | 0 | 0 |
| | | | |
| 9. | During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? | Yes Ō | No © |
| 10. | What type of fund is the private fund? | | |
| | O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund ⊙ Other priva COMMINGLED FUND | ate fur | пd: |
| | NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. | | |
| 11. | Current gross asset value of the <i>private fund:</i> \$ 0 | | |
| 0.4 | | | |
| <u>0w</u> | inership | | |
| 12. | Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0 | | |
| | NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in th organizational documents of the fund). | е | |
| 13. | Approximate number of the <i>private fund's</i> beneficial owners: 0 | | |
| | | | |
| 14. | What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0% | | |
| 15. | (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0% | | |
| | | Yes | No |
| | (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ? | 0 | 0 |
| 16. | What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0% | | |
| You | ur Advisory Services | | |
| | | Yes | No |
| 17. | (a) Are you a subadviser to this <i>private fund</i> ? | 0 | \odot |
| | (b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answe question 17.(a) is "no," leave this question blank. | - to | |
| | No Information Filed | | |
| 18. | (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund? | Yes | |
| 10. | (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i>. If the to question 18.(a) is "no," leave this question blank. | C answ | o ver |
| | No Information Filed | | |
| | | Yes | No |
| 19. | Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? NOTE: For purposes of this question, do not consider feeder funds of the private fund. | 0 | \odot |
| | | | |
| 20. | Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0% | | |
| <u>Pri</u> | vate Offering | | |
| . · | | Yes | No |

| 22. I | f yes, provide the <i>private fund's</i> Form D file number (if any): | | | | | | | |
|--------------|---|-------------------------|--|--|--|--|--|--|
| I | Form D file number | | | | | | | |
| (| 021-277682 | | | | | | | |
| | | | | | | | | |
| B. SER | VICE PROVIDERS | | | | | | | |
| | | | | | | | | |
| <u>Audit</u> | ors | | | | | | | |
| | | Yes No | | | | | | |
| 23. (| a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit? | 00 | | | | | | |
| | (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? | 0 0 | | | | | | |
| | If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one you must complete questions (b) through (f) separately for each auditing firm. | e auditing firm, | | | | | | |
| | No Information Filed | | | | | | | |
| | | Yes No | | | | | | |
| (| g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors? | 0 0 | | | | | | |
| (| h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqua | alified opinions? | | | | | | |
| | O Yes O No O Report Not Yet Received | | | | | | | |
| | If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the | report is available. | | | | | | |
| | | | | | | | | |
| Prime | e Broker | | | | | | | |
| | | Yes No | | | | | | |
| 24. (| a) Does the <i>private fund</i> use one or more prime brokers? | 00 | | | | | | |
| | If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private | | | | | | | |
| | fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker. | | | | | | | |
| | No Information Filed | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| Custo | | Yes No | | | | | | |
| 25 (| a) Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? | | | | | | | |
| 20. (| If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. | O | | | | | | |
| | fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. | in the private | | | | | | |
| | | | | | | | | |
| | Additional Custodian Information : 1 Record(s) Filed. | | | | | | | |
| | If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses <i>fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. | . If the <i>private</i> | | | | | | |
| | (b) Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY | | | | | | | |
| | (c) Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY | | | | | | | |
| | (d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country): | | | | | | | |
| | City:State:Country:BOSTONMassachusettsUnited States | | | | | | | |
| | | Yes No | | | | | | |
| | (e) Is the custodian a <i>related person</i> of your firm? | 0 6 | | | | | | |
| | | 00 | | | | | | |
| | (f) If the custodian is a broker-dealer, provide its SEC registration number (if any): | | | | | | | |
| | | | | | | | | |
| | CRD Number (if any): | | | | | | | |

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

5493006KMX1VFTPYPW14

Administrator

| 26. | (a) | Does the | private fun | d use an | administrator | other tha | n your firm? |
|-----|-----|----------|-------------|----------|---------------|-----------|--------------|
|-----|-----|----------|-------------|----------|---------------|-----------|--------------|

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

Country:

United States

Additional Administrator Information : 1 Record(s) Filed.

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

(b) Name of administrator: SEI ARCHWAY

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

| INDIANAPOLIS | Indiana |
|--------------|---------|
| | |

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

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

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

0%

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

Marketers

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

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

No Information Filed

A. PRIVATE FUND

Information About the Private Fund

- 1. (a) Name of the *private fund*: KNIGHTS OF COLUMBUS COMMINGLED FUNDS LLC - KNIGHTS OF COLUMBUS COMMINGLED LARGE CAP VALUE FUND
 - (b) Private fund identification number: (include the "805-" prefix also)
 805-5561306942

Yes No

 \odot

0

Yes No

 \odot \odot

Yes No

 \odot

| 2. | Under the laws of what state or country is the private fund organized: | | |
|-----|--|---------|---------|
| | State: Country: | | |
| | Delaware United States | | |
| 3. | (a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): | | |
| | Name of General Partner, Manager, Trustee, or Director | | |
| | KNIGHTS OF COLUMBUS COMMINGLED FUND MANAGER LLC | | |
| | | | |
| | (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. | | |
| | No Information Filed | | |
| | | | |
| 4. | The private fund (check all that apply; you must check at least one): | | |
| | (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 | | |
| | (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 | | |
| F | | | |
| 5. | List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed | | |
| | No Information Flied | | |
| / | | Yes | No |
| 6. | (a) Is this a "master fund" in a master-feeder arrangement? | 0 | \odot |
| | (b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? | | |
| | No Information Filed | | |
| | | Yes | No |
| | (c) Is this a "feeder fund" in a master-feeder arrangement? | 0 | © |
| | (d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? | U. | e |
| | Name of <i>private fund</i> : | | |
| | | | |
| | Private fund identification number: | | |
| | (include the "805-" prefix also) | | |
| | | | |
| | NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section | 7.B.(| 1) |
| | for the master-feeder arrangement or reporting on the funds separately. | · · · | . , |
| | | | |
| 7. | If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: | r eacl | h of |
| | | | |
| | No Information Filed | | |
| | No minimation riled | | |
| | | | |
| | NOTE: For purpasses of quantiens (and 7 in a master feeder arrangement, and ar more funds ("feeder funds") invest all ar substantially a | l of th | olr |
| | NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially a assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it | | |
| | multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. | | |
| | | Yes | No |
| 8. | (a) Is this <i>private fund</i> a "fund of funds"? | 0 | \odot |
| | NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment | t | |
| | vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? | ~ | ~ |
| | (b) If yes, does the private rand invest in runds managed by you of by a related person: | 0 | 0 |
| | | Vee | Na |
| 9. | During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment | Yes | |
| 7. | Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? | 0 | \odot |
| | | | |
| 10. | . What type of fund is the <i>private fund</i> ? | | |
| | O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other priva | ite fur | nd: |
| | COMMINGLED FUND | | |
| | | | |
| | NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. | | |

| 11. | Current gross asset value of the <i>private fund</i> : | | |
|------------|---|-----------|---------|
| | \$ O | | |
| <u>0w</u> | nership | | |
| 12. | Minimum investment commitment required of an investor in the <i>private fund</i> : | | |
| 12. | \$ 0 | | |
| | NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund). | e | |
| 13. | Approximate number of the <i>private fund's</i> beneficial owners: | | |
| | 0 | | |
| 14. | What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0% | | |
| 15. | (a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0% | | |
| | | Yes | No |
| | (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ? | 0 | 0 |
| 16. | What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0% | | |
| <u>Yoı</u> | ur Advisory Services | X | |
| 17 | | Yes | |
| 17. | (a) Are you a subadviser to this <i>private fund</i>? (b) If the answer to question 17. (a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i>. If the answer | O r to | O |
| | question 17.(a) is "no," leave this question blank. No Information Filed | | |
| | | Yes | No |
| 18 | (a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund? | | |
| 10. | (b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i>. If the to question 18.(a) is "no," leave this question blank. | O answ | © er |
| | No Information Filed | | |
| | | Yes | No |
| 19. | Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? | 0 | \odot |
| | NOTE: For purposes of this question, do not consider feeder funds of the private fund. | | |
| 20. | Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0% | | |
| Priv | vate Offering | | |
| | | Yes | No |
| 21. | Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? | \odot | 0 |
| 22. | If yes, provide the <i>private fund's</i> Form D file number (if any): | | |
| | Form D file number 021-277680 | | |
| | 021-277080 | | |
| B. SI | ERVICE PROVIDERS | | |
| <u>Auc</u> | ditors | | |
| 23 | (a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit? | Yes | |
| -0. | (-) (·) ································ | () | \odot |

(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?

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

No Information Filed

- (g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?
- (h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified opinions?

○ Yes ○ No ○ Report Not Yet Received

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

Prime Broker

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

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

No Information Filed

Custodian

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

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

| If the answer to questi | ion 25.(a) is "yes," respond to questions (k | o) through g) below for each custodian the <i>private fund</i> uses. If the p | rivate |
|-------------------------|--|--|--------|
| fund uses more than o | ne custodian, you must complete questions | s (b) through (g) separately for each custodian. | |
| (b) Legal name of cus | todian: | | |
| BROWN BROTHERS | S HARRIMAN AND COMPANY | | |
| (c) Primary business r | name of custodian: | | |
| BROWN BROTHERS | S HARRIMAN AND COMPANY | | |
| d) The location of the | custodian's office responsible for <i>custody</i> of | of the <i>private fund's</i> assets (city, state and country): | |
| City: BOSTON | State: Massachusetts | Country: United States | |
| DOSTON | Massachusetts | | es N |
| e) Is the custodian a | related person of your firm? | c | |
| (f) If the custodian is | a broker-dealer, provide its SEC registration | on number (if any): | |
| | v): | | |
| - CRD Number (if an | <i></i> | | |
| | | but does not have an SEC registration number, provide its <i>legal entit</i> y | / |

Administrator

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

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

Additional Administrator Information : 1 Record(s) Filed.

Yes No \odot

 \circ

Yes No

\circ \mathbf{O}

Yes No

Yes No

 \circ

 \odot

0

| | | • | s "yes," respond to questions (b) throu questions (b) through (f) separately f | ugh (f) below. If the <i>private fund</i> uses more or each administrator. | than one |
|-------------|--|--|---|---|--------------------------|
| | (| (b) Name of administrator: SEI ARCHWAY | | | |
| | | (c) Location of administrator (city | , state and country): | | |
| | | City: | State: | Country: | |
| | | INDIANAPOLIS | Indiana | United States | Yes No |
| | (| (d) Is the administrator a <i>related</i> | person of your firm? | | 0 0 |
| | | | | | |
| | (| ••• | re and send investor account stateme rs) \bigcirc Some (provided to some but no | nts to the <i>private fund's</i> investors? t all investors) O No (provided to no invest | ors) |
| | (| • | | nvestor account statements to the (rest of of the) <i>private fund's</i> investors, respond "no | |
| 27. | your <i>re</i> 0% Include relevan | e only those assets where (i) such | n <i>person</i> carried out the valuation proc used for purposes of investor subscript | alue) was valued by a <i>person</i> , such as an a redure established for that asset, if any, inc ions, redemptions or distributions, and fee | luding obtaining any |
| Mar | keters | | | | Yes No |
| 28. | (a) Do | es the <i>private fund</i> use the servic | es of someone other than you or your | employees for marketing purposes? | 0 0 |
| | sim | nilar <i>person</i> . If the answer to ques | tion 28.(a) is "yes," respond to quest | onsultant, finder, introducer, municipal advis ions (b) through (g) below for each such m questions (b) through (g) separately for ea | arketer the private fund |
| | | | No Informa | ion Filed | |
| | | | | | |
| A. PF | RIVATE F | FUND | | | |
| <u>Info</u> | rmation | About the Private Fund | | | |
| 1. | (a) Nai | me of the private fund: | | | |
| | | IGHTS OF COLUMBUS COMMINGL vate fund identification number: | ED FUNDS LLC - KNIGHTS OF COLUMBU | IS COMMINGLED LTD DURATION BOND FUNE |) |
| | • • | clude the "805-" prefix also) | | | |
| | 805 | 5-6296065680 | | | |
| 2. | Under 1 | the laws of what state or country | is the <i>private fund</i> organized: | | |
| | | ate: | Country: | | |
| | De | laware | United States | | |
| 3. | (a) Nai | me(s) of General Partner, Manage | er, Trustee, or Directors (or <i>persons</i> se | rving in a similar capacity): | |
| | | of General Partner, Manager, T | | | |
| | KNIGH | ITS OF COLUMBUS COMMINGLED | FUND MANAGER LLC | | |
| | (b) Iff | iling an umbrella registration. iden | tify the <i>filing adviser</i> and/or <i>relvina ad</i> v | <i>viser(s)</i> that sponsor(s) or manage(s) this <i>p</i> | rivate fund. |
| | | | No Informatio | | |
| | L | | | | |
| | | | | | |

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

| | No Information Filed | | |
|----------------|--|------------------------------|-------------------|
| | | Yes | ~ |
| | (a) Is this a "master fund" in a master-feeder arrangement? | o res | (|
| | (b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? | 0 | ` |
| | No Information Filed | | |
| | | | |
| | | Yes | N |
| | (c) Is this a "feeder fund" in a master-feeder arrangement? | 0 | (|
| | (d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> : | | |
| | <i>Private fund</i> identification number: (include the "805-" prefix also) | | |
| | NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Sectio for the master-feeder arrangement or reporting on the funds separately. | n 7.B. | (1) |
| | If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), the feeder funds answer the following questions: | for eac | h |
| | No Information Filed | | |
| | NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially a assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. | | ed |
| ١. | 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 issue Yes | ed N |
| 5. | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme | it issue Yes | ed N |
| | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | it issue Yes O nt | ed N |
| | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | Yes Yes O nt Yes | ed N (|
| 3. 9. | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i>? | Yes Yes O nt Yes | ed N (N |
| ۹. | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i>? | Yes Ont Yes O | ≥d N ((|
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| о. О. | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investmet vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O other <i>privace</i> COMMINGLED FUND | Yes Ont Yes O | ed N (|
| O. | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investmet vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? A hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O other <i>private fund</i> . NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. | Yes Ont Yes O | ∍d P I |
| O. | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investmet vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund © Other <i>private OMMINGLED FUND</i> NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. Current gross asset value of the <i>private fund</i> : | Yes Ont Yes O | ≥d N I I |
| 0. 1. | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.?? What type of fund is the <i>private fund</i> O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund © other <i>private fund</i> : S 50,751,649 Minimum investment commitment required of an investor in the <i>private fund</i> : | Yes Ont Yes O | ≥d N I I |
| 0. 1. | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund © Other <i>priv</i> COMMINGLED FUND NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. Current gross asset value of the <i>private fund</i> : § 50,751,649 | Yes Ont Yes O | ed r |
| 0. 1. 2. | 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 multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investme vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O other <i>private fund</i> . So, 751, 649 Minimum investment commitment required of an investor in the <i>private fund</i> : So, NOTE: Report the amount routinely reguired of investors who are not your <i>related persons</i> (even if different from the amount set forth in the set of the amount set forth in the set of the set of the set of the amount set forth in the set of the set of the set of the set of the amount set forth in the set of the set o | Yes Ont Yes O | ed r |

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

| | 0% | | | |
|------------|-----------|---|---------|------------|
| 15. | (a) 0% | What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: | | |
| | | N | 'es | No |
| | | If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ? | 0 | 0 |
| 16. | Wha | at is the approximate percentage of the private fund beneficially owned by non-United States persons: | | |
| | | | | |
| <u>Υοι</u> | ur Ac | Ivisory Services | 'es | No |
| 17. | (a) | Are you a subadviser to this <i>private fund</i> ? | 0 | • |
| | (b) | If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer t question 17.(a) is "no," leave this question blank. | ~ | |
| | | No Information Filed | | |
| | | | 'es | No |
| 18. | | Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund? | 0 | \odot |
| | | If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the a to question 18.(a) is "no," leave this question blank. | ารพ | Эr |
| | | No Information Filed | | |
| 10 | Aro | | 'es | |
| 19. | | your clients solicited to invest in the private fund? TE: For purposes of this question, do not consider feeder funds of the private fund. | 0 | \odot |
| | NOT | | | |
| 20. | Арр 1% | roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? | | |
| Driv | vato | Offering | | |
| | vate | | 'es | No |
| 21. | Has | the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? | 0 | 0 |
| 22. | lf y | es, provide the <i>private fund's</i> Form D file number (if any): | | |
| | For | m D file number | | |
| | 02 | 1-277679 | | |
| ПС | | | | |
| Б. Э | ERVI | CE PROVIDERS | | |
| <u>Auc</u> | ditors | | | |
| | | | /es | No |
| 23. | (a) | (1) Are the <i>private fund's</i> financial statements subject to an annual audit? | \odot | \circ |
| | | (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? | \odot | $^{\circ}$ |
| | | If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. | firm | r |
| | | Additional Auditor Information : 1 Record(s) Filed. | | |
| | | If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. | | |
| | | | | |
| | | (b) Name of the auditing firm: SPICER JEFFRIES LLP | | |
| | | (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): | | |
| | | City: State: Country: | | |
| | | DENVER Colorado United States | | |
| | | | s N | 0 |
| | | (d) Is the auditing firm an <i>independent public accountant</i> ? | (| |

| (e) | Is the auditing firm registered with the Public Company Accounting Oversight Board? | \odot | C |
|---|--|----------------|---------|
| | If yes, Public Company Accounting Oversight Board-Assigned Number: 349 | | |
| (f) | If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? | o | (|
| | | Y | es |
| | ne private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's | 6 | |
| inves Do all | of the reports prepared by the auditing firm for the <i>private fund</i> since your last annual updating amendment contain unqualified | opinia | ong |
| | s ^O No ^O Report Not Yet Received | sprine | 211 |
| | check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report | 's ava | ila |
| Broker | | | |
| Dioker | | Ye | es |
| | the <i>private fund</i> use one or more prime brokers? | _ | 0 |
| | answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If t uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker. | ne <i>pr</i> | iva |
| | No Information Filed | | |
| | | | |
| | | | |
| ion | | | |
| ian | | Ye | es |
| | the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? | | es |
| Does If the | answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the | ¢ |) |
| Does If the | | ¢ | |
| Does If the <i>fund</i> u | answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the | ¢ |) |
| Does If the <i>fund</i> u | answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. | ¢ |) |
| Does If the <i>fund</i> u Addi | answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. | (privat | te |
| Does If the <i>fund</i> u Addin | answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. tional Custodian Information : 1 Record(s) Filed. | (privat | te |
| Does If the <i>fund</i> u Addi If th <i>fund</i> (b) | answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. tional Custodian Information : 1 Record(s) Filed. the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. | (privat | te |
| Does If the <i>fund</i> u Addin If th <i>fund</i> (b) (c) | answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. tional Custodian Information : 1 Record(s) Filed. the answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY | (privat | te |
| Does If the <i>fund</i> u Addin If th <i>fund</i> (b) (c) | answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the ises more than one custodian, you must complete questions (b) through (g) separately for each custodian. tional Custodian Information : 1 Record(s) Filed. the answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country): City: State: Country: | (privat | te |
| Does If the <i>fund</i> u Addin If th <i>fund</i> (b) (c) | answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the ises more than one custodian, you must complete questions (b) through (g) separately for each custodian. tional Custodian Information : 1 Record(s) Filed. the answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country): | e priva | ate |
| Does If the <i>fund</i> u Addin If th <i>fund</i> (b) (c) (d) | answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the ises more than one custodian, you must complete questions (b) through (g) separately for each custodian. tional Custodian Information : 1 Record(s) Filed. the answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY The location of the custodian's office responsible for <i>custody</i> of the <i>private fund's</i> assets (city, state and country): City: State: Country: | (privat | te I |
| Does If the fund u Addi If th fund (b) (c) (d) (e) | answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the ises more than one custodian, you must complete questions (b) through (g) separately for each custodian. tional Custodian Information : 1 Record(s) Filed. te answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state and country): City: State: Country: BOSTON Massachusetts United States Is the custodian a <i>related person</i> of your firm? | e priva | |
| Does If the fund u Addi If th fund (b) (c) (d) (e) | answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Teache answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the dueses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the dueses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the dueses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the dueses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state and country): City: State: Country: BOSTON Massachusetts United States Is the custodian a <i>related person</i> of your firm? If the custodian is a broker-dealer, provide its SEC registration number (if any): - | e priva | ate |
| Does If the fund u Addi If th fund (b) (c) (d) (e) | answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the ises more than one custodian, you must complete questions (b) through (g) separately for each custodian. tional Custodian Information : 1 Record(s) Filed. te answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the d uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state and country): City: State: Country: BOSTON Massachusetts United States Is the custodian a <i>related person</i> of your firm? | e priva | |
| Does If the fund u Addin (b) (c) (d) (e) (f) | answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Teache answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the dueses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the dueses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the dueses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> uses. If the dueses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state and country): City: State: Country: BOSTON Massachusetts United States Is the custodian a <i>related person</i> of your firm? If the custodian is a broker-dealer, provide its SEC registration number (if any): - | e priva Yes | |
| Does If the fund u Addin (b) (c) (d) (e) (f) | answer to question 25. (a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses. If the isses more than one custodian, you must complete questions (b) through (g) separately for each custodian. tional Custodian Information : 1 Record(s) Filed. te answer to question 25. (a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> uses. If the <i>d</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian the <i>private fund</i> uses. If the <i>d</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian the <i>private fund</i> uses. If the <i>d</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Legal name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY Primary business name of custodian: BROWN BROTHERS HARRIMAN AND COMPANY The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state and country): City: State: Country: BOSTON Massachusetts United States Is the custodian is a broker-dealer, provide its SEC registration number (if any): CRD Number (if any): | e priva Yes | ate |

| | dditional Administrator Information : 1 Rec | cord(s) Filed. | | |
|--|--|---|--|---|
| | If the answer to question 26.(a) is "yes," res administrator, you must complete questions | • • • • • • | | than one |
| (| (b) Name of administrator: SEI ARCHWAY | | | |
| (| (c) Location of administrator (city, state and | l country): | | |
| | City: | State: | Country: | |
| | INDIANAPOLIS | Indiana | United States | Yes No |
| (| (d) Is the administrator a <i>related person</i> of y | our firm? | | 0 0 |
| (| (e) Does the administrator prepare and sen | d investor account statemer | nts to the <i>private fund's</i> investors? | |
| | · · · | | all investors) ONo (provided to no investo | ors) |
| (| | | nvestor account statements to the (rest of f the) <i>private fund's</i> investors, respond "no | |
| nclude elevan locati | e only those assets where (i) such <i>person</i> ca nt quotes, and (ii) the valuation used for pur ions) was the valuation determined by such | rposes of investor subscription | • | |
| nclude elevan Ilocati eters a) Doo You | nt quotes, and (ii) the valuation used for pur | rposes of investor subscription person. Some other than you or your ts as a placement agent, co | ons, redemptions or distributions, and fee on <i>employees</i> for marketing purposes? nsultant, finder, introducer, municipal advis | calculations (including Yes or or other solicitor, or |
| elevan Ilocati eters a) Doo You sim | nt quotes, and (ii) the valuation used for pur ions) was the valuation determined by such wes the <i>private fund</i> use the services of some u must answer "yes" whether the <i>person</i> ac | rposes of investor subscription person. eone other than you or your ts as a placement agent, co b is "yes," respond to question | employees for marketing purposes? nsultant, finder, introducer, municipal advis | calculations (including Yes or or other solicitor, or arketer the <i>private fund</i> |
| nclude elevan llocati eters a) Doo You sim | nt quotes, and (ii) the valuation used for pur ions) was the valuation determined by such ses the <i>private fund</i> use the services of some u must answer "yes" whether the <i>person</i> ac nilar <i>person</i> . If the answer to question 28.(a) | rposes of investor subscription person. eone other than you or your ts as a placement agent, co b is "yes," respond to question | ons, redemptions or distributions, and fee o <i>employees</i> for marketing purposes? nsultant, finder, introducer, municipal advisons (b) through (g) below for each such ma questions (b) through (g) separately for ea | calculations (including Yes or or other solicitor, or arketer the <i>private fund</i> |
| a) Doo You use | nt quotes, and (ii) the valuation used for pur ions) was the valuation determined by such the private fund use the services of some u must answer "yes" whether the <i>person</i> act inilar <i>person</i> . If the answer to question 28.(a) es. If the <i>private fund</i> uses more than one m | rposes of investor subscription person. eone other than you or your ts as a placement agent, co is "yes," respond to question arketer you must complete | ons, redemptions or distributions, and fee o <i>employees</i> for marketing purposes? nsultant, finder, introducer, municipal advisons (b) through (g) below for each such ma questions (b) through (g) separately for ea | calculations (including Yes or or other solicitor, or arketer the <i>private fund</i> |
| A) Doo You Sim Use | nt quotes, and (ii) the valuation used for pur ions) was the valuation determined by such the private fund use the services of some u must answer "yes" whether the <i>person</i> act inilar <i>person</i> . If the answer to question 28.(a) es. If the <i>private fund</i> uses more than one m | rposes of investor subscription person. eone other than you or your ts as a placement agent, co is "yes," respond to question arketer you must complete | ons, redemptions or distributions, and fee o <i>employees</i> for marketing purposes? nsultant, finder, introducer, municipal advisons (b) through (g) below for each such ma questions (b) through (g) separately for ea | calculations (including Yes or or other solicitor, or arketer the <i>private fund</i> |
| a) Doo You Sim Use /ATE F | nt quotes, and (ii) the valuation used for pur ions) was the valuation determined by such the set the <i>private fund</i> use the services of some u must answer "yes" whether the <i>person</i> act nilar <i>person</i> . If the answer to question 28.(a) es. If the <i>private fund</i> uses more than one m | rposes of investor subscription person. eone other than you or your ts as a placement agent, co b is "yes," respond to question arketer you must complete No Information | ons, redemptions or distributions, and fee of employees for marketing purposes? Insultant, finder, introducer, municipal advisions (b) through (g) below for each such ma questions (b) through (g) separately for ea on Filed | calculations (including Yes or or other solicitor, or arketer the <i>private fund</i> |
| a) Doo Simuse (ATE F A) Nar Simuse (ATE F A) Nar S) Priv (inc | The private fund use the services of some uses the private fund use the services of some u must answer "yes" whether the person act nilar person. If the answer to question 28. (a) es. If the private fund uses more than one m umber the private | rposes of investor subscription person. eone other than you or your ts as a placement agent, co b is "yes," respond to question arketer you must complete No Information | ons, redemptions or distributions, and fee of employees for marketing purposes? Insultant, finder, introducer, municipal advisions (b) through (g) below for each such ma questions (b) through (g) separately for ea on Filed | calculations (including Yes or or other solicitor, or arketer the <i>private fund</i> |
| a) Doo Simuse A) Doo You Simuse /ATE F Aa) Nar KN b) Priv (inc 805 | The private fund use the services of some u must answer "yes" whether the <i>person</i> action inlar <i>person</i> . If the answer to question 28. (a) es. If the <i>private fund</i> uses more than one main set. If the <i>private fund</i> uses more than one main fund About the <i>Private fund</i> uses more than one main me of the <i>private fund</i> : IIGHTS OF COLUMBUS COMMINGLED FUNDS I invate fund identification number: clude the "805-" prefix also) | rposes of investor subscription person. eone other than you or your ts as a placement agent, co) is "yes," respond to question arketer you must complete No Information | ons, redemptions or distributions, and fee of employees for marketing purposes? Insultant, finder, introducer, municipal advisions (b) through (g) below for each such ma questions (b) through (g) separately for ea on Filed | ves calculations (including Yes or or other solicitor, or arketer the <i>private fund</i> |
| a) Doo Sters a) Doo You sim use /ATE F a) Nar KN b) Priv (inc 805 nder t Sta | The private fund use the services of some uses the private fund use the services of some uses answer "yes" whether the person activate fund uses more than one means of the private fund uses more than one means of the private fund uses more than one means of the private fund uses more than one means of the private fund uses fund uses the private fund uses the private fund uses fund uses fund uses the private fund uses fund | rposes of investor subscription person. eone other than you or your ts as a placement agent, co) is "yes," respond to question arketer you must complete No Information | ons, redemptions or distributions, and fee of employees for marketing purposes? Insultant, finder, introducer, municipal advisions (b) through (g) below for each such ma questions (b) through (g) separately for ea on Filed | ves calculations (including Yes or or other solicitor, or arketer the <i>private fund</i> |
| a) Doo Simuse (A) Doo You Simuse (ATE F A) Nar KN (Inc 805 Nar KN (Inc 805 Nar KN (Inc 805 Nar KN (Inc | The laws of what state or country is the <i>priva</i> | rposes of investor subscription person. eone other than you or your ts as a placement agent, co b is "yes," respond to question arketer you must complete No Information UNO Information UNO Information Read fund organized: Country: United States | employees for marketing purposes? nsultant, finder, introducer, municipal advis ons (b) through (g) below for each such ma questions (b) through (g) separately for ea on Filed S COMMINGLED SMALL CAP EQUITY FUND | ves calculations (including Yes or or other solicitor, or arketer the <i>private fund</i> |

| | (b) If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>private fund</i> . No Information Filed | | |
|-----------|---|-------------------|---------|
| | | | |
| 4. | The private fund (check all that apply; you must check at least one): | | |
| | (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 | | |
| | (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 | | |
| 5. | List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. | | |
| | No Information Filed | | |
| | | Yes | No |
| 6. | (a) Is this a "master fund" in a master-feeder arrangement? | 0 | \odot |
| | (b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ? | | |
| | No Information Filed | | |
| | | Yes | No |
| | (c) Is this a "feeder fund" in a master-feeder arrangement? | - | - |
| | (d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? | 0 | \odot |
| | Name of <i>private fund</i> : | | |
| | Private fund identification number: | | |
| | (include the "805-" prefix also) | | |
| | | | |
| | NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section for the master-feeder arrangement or reporting on the funds separately. | 7.B.(| 1) |
| 7. | If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: | ⁻ eacl | ר of |
| | | | |
| | No Information Filed | | |
| | | C 11 | |
| | NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. | | |
| | | Yes | No |
| 8. | (a) Is this <i>private fund</i> a "fund of funds"? | 0 | \odot |
| | NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | | |
| | (b) If yes, does the private fund invest in funds managed by you or by a related person? | 0 | 0 |
| | | M = = | N |
| 9. | During your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment | Yes | |
| 7. | Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? | 0 | o |
| 10. | What type of fund is the <i>private fund</i> ? | | |
| | O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private | te fur | nd: |
| | COMMINGLED FUND | | |
| | NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. | | |
| 11. | Current gross asset value of the private fund: | | |
| | \$ O | | |
| <u>Ow</u> | nership | | |
| 12. | Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 0 | | |
| | NOTE: Depart the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the | | |

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

| 13. | App 0 | proximate number of the <i>private fund's</i> beneficial owners: | | |
|-------------|-----------|---|-----------|---------|
| 14. | Wha | at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : | | |
| 15. | (a) 0% | What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: | | |
| | (b) | If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ? | Yes O | No O |
| 16. | Wha | at is the approximate percentage of the <i>private fund</i> beneficially owned by non-United States persons: | | |
| <u>You</u> | ır Ac | dvisory Services | Yes | No |
| 17. | (a) | Are you a subadviser to this <i>private fund</i> ? | 0 | © |
| | | If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank. | | e |
| | | No Information Filed | | |
| | | | Yes | No |
| 18. | | Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ? If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank. | O answ | © er |
| | | No Information Filed | | |
| | | | Yes | No |
| 19. | Are | your <i>clients</i> solicited to invest in the <i>private fund</i> ? | 0 | \odot |
| | NOT | TE: For purposes of this question, do not consider feeder funds of the private fund. | | |
| 20. | Арр 0% | proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? | | |
| <u>Priv</u> | /ate | Offering | Yes | Ne |
| 21. | Has | s the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? | © | 0 |
| 22. | lf y | es, provide the <i>private fund's</i> Form D file number (if any): | | |
| | For | rm D file number | | |
| | 02 | 1-277681 | | |
| B. SI | ERVI | CE PROVIDERS | | |
| Auc | litors | S | | |
| | | | Yes | No |
| 23. | (a) | (1) Are the private fund's financial statements subject to an annual audit? | 0 | \odot |
| | | (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? | 0 | 0 |
| | | If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. | ı firm | , |
| | | No Information Filed | | |
| | | | | 1 |
| | | | Yes | No |
| | (g) | Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors? | 0 | 0 |

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

O Yes O No O Report Not Yet Received

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

Yes No

Prime Broker

| $\gamma 4$ | (_) | Deee | + | melicata | finad | | ~ ~ ~ | ~ ~ | | in million o | h maliama O |
|------------|-----|------|-------|----------|---------|-------|-------|-----|--------|--------------|-------------|
| 74 | (2) | DOES | I N P | DINAIP | 1111111 | LISP. | ONE | ()[| THOLE | DIIMA | brokers? |
| ~ | (4) | 0000 | | private | rana | 000 | 0110 | 0. | 111010 | printo | DI OICOI DI |

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

No Information Filed

<u>Custodian</u>

| | | | Yes | No |
|-----|-----|--|---------|----|
| 25. | (a) | Does the private fund use any custodians (including the prime brokers listed above) to hold some or all of its assets? | \odot | 0 |
| | | If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If the pri | ate | |

| Additional Custodia | n Information : 1 Record(s) Filed. | | |
|--|---|--|-----------------------|
| • | | b) through g) below for each custodian the <i>private fund</i> uses. s (b) through (g) separately for each custodian. | If the <i>private</i> |
| (b) Legal name of BROWN BROTH | custodian: ERS HARRIMAN AND COMPANY | | |
| | ss name of custodian: ERS HARRIMAN AND COMPANY | | |
| (d) The location of | the custodian's office responsible for custody | of the <i>private fund's</i> assets (city, state and country): | |
| City: BOSTON | State: Massachusetts | Country: United States | |
| (e) Is the custodia | n a related person of your firm? | | Yes N |
| (f) If the custodiar | n is a broker-dealer, provide its SEC registratio | n number (if any): | |
| - CRD Number (if | any): | | |
| (g) If the custodiar identifier (if any | | but does not have an SEC registration number, provide its <i>le</i> g | gal entity |
| 5493006KMX1\ | VFTPYPW14 | | |

Administrator

City:

INDIANAPOLIS

| | Yes | No |
|--|---------|---------|
| 26. (a) Does the private fund use an administrator other than your firm? | \odot | \circ |
| If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrate must complete questions (b) through (f) separately for each administrator. | r, ya | วน |
| Additional Administrator Information : 1 Record(s) Filed. | | |
| If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator. | | |
| (b) Name of administrator: SEI ARCHWAY | | |

State:

Indiana

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

Country: United States

| (\mathbf{P}) | ls tho | administrator | С | rolatod | norson | of | vour | firm? |
|----------------|--------|---------------|---|---------|--------|----|------|-------|
| u) | 15 the | administrator | а | relateu | person | ΟI | your | |

Yes No

 \odot

0

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

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

0%

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

Marketers

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

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

No Information Filed

A. PRIVATE FUND

Information About the Private Fund

- 1. (a) Name of the *private fund*: KNIGHTS OF COLUMBUS LONG/SHORT EQUITY FUND, L.P. (b) Private fund identification number:
 - (include the "805-" prefix also) 805-6950182582

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

| State: | Country: |
|----------|---------------|
| Delaware | United States |

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

| | Name of General Partner, Manager, Trustee, or Director |
|----|---|
| | KNIGHTS OF COLUMBUS LONG/SHORT EQUITY FUND GP, LLC |
| | (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. |
| | No Information Filed |
| 4. | The private fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 |
| 5. | List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. |
| | No Information Filed |

Yes No

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

0 \odot

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

| | | Yes N | ο |
|-----|--|-----------|----|
| | (c) Is this a "feeder fund" in a master-feeder arrangement? | 0.0 | |
| | (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? | ~ ~ | - |
| | Name of <i>private fund</i> : | | |
| | | | |
| | Private fund identification number: | | |
| | (include the "805-" prefix also) | | |
| | | | |
| | | | |
| | NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section | n 7.B.(1) | |
| | for the master-feeder arrangement or reporting on the funds separately. | | |
| | | | |
| 7. | If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: | or each o |)† |
| | | | |
| | | | |
| | No Information Filed | | |
| | | | |
| | | | |
| | NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially a | | - |
| | assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it | t 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. | | |
| 0 | (a) to this private fund a "fund of funde"? | Yes N | |
| 8. | (a) Is this <i>private fund</i> a "fund of funds"? | 00 | |
| | NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investmer vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | ht | |
| | (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? | ~ ~ | |
| | (b) If yes, does the private rand invest in funds managed by you of by a related person: | 0 0 | 2 |
| | | | |
| _ | | Yes N | |
| 9. | During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? | 0 0 | 0 |
| | company Act of 1740 (other than money market funds, to the extent provided in mistidetion o.e.): | | |
| 10. | What type of fund is the <i>private fund</i> ? | | |
| | | | |
| | • hedge fund • liquidity fund • private equity fund • real estate fund • securitized asset fund • venture capital fund • Other private equity fund • real estate fund • securitized asset fund • venture capital fund • Other private equity fund • real estate fund • securitized asset fund • venture capital fund • Other private equity fund • real estate fund • securitized asset fund • venture capital fund • other private equity fund • real estate fund • securitized asset fund • venture capital fund • other private equity fund • venture capital fund • other private equity fund • other priv | ate fund: | |
| | NOTE: For definitions of these fund types, places see lectrustion 6 of the lectrustions to Part 14 | | |
| | NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A. | | |
| 11 | Current gross asset value of the <i>private fund</i> : | | |
| 11. | \$ 55,239,612 | | |
| | | | |
| Ow | mership | | |
| | | | |
| 12. | Minimum investment commitment required of an investor in the private fund: | | |
| | \$ O | | |
| | NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in th | ie | |
| | organizational documents of the fund). | | |
| | | | |
| 13. | Approximate number of the private fund's beneficial owners: | | |
| | 1 | | |
| | | | |
| 14. | What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : | | |
| | 100% | | |
| | | | |
| 15. | (a) What is the approximate percentage of the private fund beneficially owned (in the aggregate) by funds of funds: | | |
| | 0% | | |
| | | Yes N | 0 |
| | (b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ? | 0 0 | |
| | ourpary net of 17to, are bares of the fund infilled to <i>qualified elicitis</i> : | | |

16. What is the approximate percentage of the *private fund* beneficially owned by non-*United States persons*:0%

| | | visory Services | | |
|------|------------|--|------------------------|-----------|
| 17. | (a) | Are you a subadviser to this <i>private fund</i> ? | Ye | s No |
| | (b) | If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer question 17.(a) is "no," leave this question blank. | ~ | Č |
| | | No Information Filed | | |
| | | | Ye | s No |
| 18. | (a) | Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund? | \odot | С |
| | | If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank. | ans | wer |
| | | Name of Other Adviser to <i>private fund</i> SEC file number CRD number | | |
| | | L2 ASSET MANAGEMENT, LLC 801-107084 172688 | | |
| 19. | Are | your <i>clients</i> solicited to invest in the <i>private fund</i> ? | Ye | s No |
| | NOT | E: For purposes of this question, do not consider feeder funds of the private fund. | | ~ |
| 20. | Appi 1% | roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? | | |
| Priv | vate | Offering | V | |
| 21. | Has | the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? | ve | s No O |
| | | | e | Ū |
| 22. | lf y€ | es, provide the <i>private fund's</i> Form D file number (if any): | | |
| | | m D file number -316977 | | |
| | itors | | | |
| 23. | (a) | (1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? | c | C |
| 23. | (a) | (1) Are the private fund's financial statements subject to an annual audit? | c | c |
| 23. | (a) | (1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing | c | c |
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| 23. | (a) | (1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information : 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: SPICER JEFFRIES LLP (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: State: DENVER Colorado (d) Is the auditing firm an <i>independent public accountant</i> ? | € g fir ⁄es € | No O |

| (g) |) Are the <i>private fund's</i> audited financia investors? | I statements for the most rec | ently completed fiscal year distributed to the private fund | 's oo |
|---------|---|---|--|-----------------------------|
| (h) |) Do all of the reports prepared by the a | auditing firm for the <i>private fu</i> | nd since your last annual updating amendment contain un | qualified opinions? |
| | ⊙ Yes O No O Report Not Yet Rece | ived | | |
| | If you check "Report Not Yet Received," | " you must promptly file an am | endment to your Form ADV to update your response when t | he report is available. |
| Prime | Broker | | | |
| | | | | Yes No |
| 24. (a) |) Does the <i>private fund</i> use one or more | | | 00 |
| | • | | through (e) below for each prime broker the <i>private fund</i> ns (b) through (e) separately for each prime broker. | uses. If the <i>private</i> |
| | Additional Prime Broker Information | on : 1 Record(s) Filed. | | |
| | • • • | · · · · | b) through (e) below for each prime broker the <i>private fur</i> e questions (b) through (e) separately for each prime bro | |
| | (b) Name of the prime broker: WELLS FARGO SECURITIES, LLC | : | | |
| | (c) If the prime broker is registered 8 - 65876 | d with the SEC, its registration | number: | |
| | CRD Number (if any): 126292 | | | |
| | (d) Location of prime broker's office | | | |
| | City: NEW YORK | State: New York | Country: United States | |
| | | | | Yes No |
| | (e) Does this prime broker act as c | ustodian for some or all of the | e private fund's assets? | • • |
| | | | | |
| Custod | lian | | | Yes No |
| 25. (a) |) Does the <i>private fund</i> use any custodi | ans (including the prime brok | ers listed above) to hold some or all of its assets? | • • |
| | • • • • | | through (g) below for each custodian the <i>private fund</i> use (b) through (g) separately for each custodian. | es. If the <i>private</i> |
| | Additional Custodian Information : | 1 Record(s) Filed. | | |
| | • | • | b) through g) below for each custodian the <i>private fund</i> us s (b) through (g) separately for each custodian. | ses. If the <i>private</i> |
| | (b) Legal name of custodian: WELLS FARGO SECURITIES, LLC | : | | |
| | (c) Primary business name of custo WELLS FARGO SECURITIES, LLC | | | |
| | (d) The location of the custodian's | office responsible for <i>custody</i> | of the <i>private fund's</i> assets (city, state and country): | |
| | City: | State: | Country: | |

| | INC W FOR | onneu states | |
|---------------------------|-----------------------------|--------------|--------|
| | | | Yes No |
| (e) Is the custodian a re | elated person of your firm? | | 00 |
| | | | |

(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):
 8 - 65876

CRD Number (if any): 126292

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

Administrator

Yes No

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

 \odot \circ

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

| | If the answer to question 26.(a) is "yes administrator, you must complete ques | | ugh (f) below. If the <i>private fund</i> uses more than one or each administrator. | | |
|---|---|---|--|---------------------------------------|--------------|
| | (b) Name of administrator: | | | | |
| | SEI ARCHWAY | | | | |
| | (c) Location of administrator (city, stat | e and country): | | | |
| | City: | State: | Country: | | |
| | INDIANAPOLIS | Indiana | United States | Yes N | lo |
| | (d) Is the administrator a <i>related perso</i> | <i>n</i> of your firm? | | - | • |
| | (a) Dass the administrator propers on | d cond invector account stateme | nto to the private fund's investors? | | |
| | (e) Does the administrator prepare an Yes (provided to all investors) | | t all investors) oNo (provided to no investors) | | |
| | | | | | |
| | · · · · · · · · · · · · · · · · · · · | "no" or "some," who sends the | nvestor account statements to the (rest of the) private fi | und's | |
| your | ng your last fiscal year, what percentage <i>related person</i> ? | | of the) <i>private fund's</i> investors, respond "not applicable." alue) was valued by a <i>person</i> , such as an administrator, | | ot |
| your 100% Inclu relev alloca | ng your last fiscal year, what percentage <i>related person</i> ? % ude only those assets where (i) such <i>pers</i> vant quotes, and (ii) the valuation used f ations) was the valuation determined by | of the <i>private fund's</i> assets (by v son carried out the valuation proc or purposes of investor subscript | of the) <i>private fund's</i> investors, respond "not applicable." | that is n ng any | |
| your 100% Inclu relev alloca | ng your last fiscal year, what percentage <i>related person</i> ? % ude only those assets where (i) such <i>pers</i> vant quotes, and (ii) the valuation used f ations) was the valuation determined by | of the <i>private fund's</i> assets (by v son carried out the valuation proc or purposes of investor subscript | of the) <i>private fund's</i> investors, respond "not applicable." alue) was valued by a <i>person</i> , such as an administrator, edure established for that asset, if any, including obtaini | that is n ng any ncluding | |
| your 1009 Inclu relev alloca | ng your last fiscal year, what percentage <i>related person</i> ? % ude only those assets where (i) such <i>pers</i> vant quotes, and (ii) the valuation used f ations) was the valuation determined by | of the <i>private fund's</i> assets (by v son carried out the valuation proc or purposes of investor subscript such <i>person</i> . | of the) <i>private fund's</i> investors, respond "not applicable." alue) was valued by a <i>person</i> , such as an administrator, edure established for that asset, if any, including obtaini ions, redemptions or distributions, and fee calculations (i | that is n ng any ncluding | es l |
| your 1009 Inclu relev alloca keter (a) [| ng your last fiscal year, what percentage related person? % ude only those assets where (i) such person vant quotes, and (ii) the valuation used for ations) was the valuation determined by TS Does the private fund use the services of You must answer "yes" whether the person similar person. If the answer to question 2 | of the <i>private fund's</i> assets (by v son carried out the valuation proc or purposes of investor subscript such <i>person</i> . someone other than you or your son acts as a placement agent, co 28.(a) is "yes," respond to quest | of the) <i>private fund's</i> investors, respond "not applicable." alue) was valued by a <i>person</i> , such as an administrator, edure established for that asset, if any, including obtaini ions, redemptions or distributions, and fee calculations (i | that is n ng any ncluding Ye | es) r |
| your 1009 Inclu relev alloca keter (a) [| ng your last fiscal year, what percentage related person? % ude only those assets where (i) such person vant quotes, and (ii) the valuation used for ations) was the valuation determined by TS Does the private fund use the services of You must answer "yes" whether the person similar person. If the answer to question 2 | of the <i>private fund's</i> assets (by v son carried out the valuation proc or purposes of investor subscript such <i>person</i> . someone other than you or your son acts as a placement agent, co 28.(a) is "yes," respond to quest | of the) <i>private fund's</i> investors, respond "not applicable." alue) was valued by a <i>person</i> , such as an administrator, edure established for that asset, if any, including obtaini ions, redemptions or distributions, and fee calculations (i <i>employees</i> for marketing purposes? ensultant, finder, introducer, municipal advisor or other so ons (b) through (g) below for each such marketer the <i>pr</i> questions (b) through (g) separately for each marketer. | that is n ng any ncluding Ye | es) r |
| your 1009 Inclu relev alloca (a) [(a) [| ng your last fiscal year, what percentage related person? % ude only those assets where (i) such person vant quotes, and (ii) the valuation used for ations) was the valuation determined by TS Does the private fund use the services of You must answer "yes" whether the person similar person. If the answer to question 2 | of the <i>private fund's</i> assets (by v son carried out the valuation proc or purposes of investor subscript such <i>person</i> . someone other than you or your son acts as a placement agent, co 28. (a) is "yes," respond to quest one marketer you must complete | of the) <i>private fund's</i> investors, respond "not applicable." alue) was valued by a <i>person</i> , such as an administrator, edure established for that asset, if any, including obtaini ions, redemptions or distributions, and fee calculations (i <i>employees</i> for marketing purposes? ensultant, finder, introducer, municipal advisor or other so ons (b) through (g) below for each such marketer the <i>pr</i> questions (b) through (g) separately for each marketer. | that is n ng any ncluding Ye | es) r |
| your 1009 Inclu relev alloca | ng your last fiscal year, what percentage related person? % ude only those assets where (i) such person vant quotes, and (ii) the valuation used for ations) was the valuation determined by TS Does the private fund use the services of You must answer "yes" whether the person similar person. If the answer to question 2 | of the <i>private fund's</i> assets (by v son carried out the valuation proc or purposes of investor subscript such <i>person</i> . someone other than you or your son acts as a placement agent, co 28. (a) is "yes," respond to quest one marketer you must complete | of the) <i>private fund's</i> investors, respond "not applicable." alue) was valued by a <i>person</i> , such as an administrator, edure established for that asset, if any, including obtaini ions, redemptions or distributions, and fee calculations (i <i>employees</i> for marketing purposes? ensultant, finder, introducer, municipal advisor or other so ons (b) through (g) below for each such marketer the <i>pr</i> questions (b) through (g) separately for each marketer. | that is n ng any ncluding Ye | r |

- 1. (a) Name of the *private fund*: KNIGHTS OF COLUMBUS PRIVATE CREDIT FUND, LP
 - (b) Private fund identification number: (include the "805-" prefix also) 805-6925510506
- 2. Under the laws of what state or country is the *private fund* organized: State: Country:

| 3. | | | |
|----|---|------------------------------------|-------------------------------------|
| З. | (a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): | | |
| | Name of General Partner, Manager, Trustee, or Director | | |
| | KOCAA PRIVATE CREDIT FUND GP LLC | _ | |
| | | | |
| | (b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund. | | |
| | No Information Filed | | |
| | | | |
| 4. | The <i>private fund</i> (check all that apply; you must check at least one): | | |
| | (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 | | |
| | (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 | | |
| | | | |
| 5. | List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. | | |
| | No Information Filed | | |
| | | Yes | No |
| 6. | (a) Is this a "master fund" in a master-feeder arrangement? | 0 | \odot |
| | (b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund? | | |
| | No Information Filed | | |
| | | | |
| | | Yes | No |
| | (c) Is this a "feeder fund" in a master-feeder arrangement? | 0 | \odot |
| | (d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? | | |
| | Name of <i>private fund</i> : | | |
| | Private fund identification number: | | |
| | (include the "805-" prefix also) | | |
| | | | |
| | | | (1) |
| 7. | | | |
| 7. | for the master-feeder arrangement or reporting on the funds separately. | | |
| 7. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: | | |
| 7. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for | | |
| 7. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: | | |
| 7. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: | or eac | h of |
| | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. | or eac | h of |
| 7. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. | or eac | h of |
| | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially al assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment | or eac Il of th issue Yes | h of neir ed No |
| | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? | Il of the issue Yes | h of neir ed No |
| | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially al assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | or eac Il of th issue Yes | h of neir ed No |
| | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially al assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. | or eac | h of neir ed No © |
| | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? | or eac | h of neir ed No © No |
| 8. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? | or eac | h of neir ed No © |
| 8. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially at assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? | or eac | h of neir ed No © No |
| 8. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially at assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? | or eac | h of neir ed No © No |
| 8. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B. (1) for a master-feeder arrangement according to the instructions to this Section 7.B. (1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? | or eac | h of neir ed No © No |
| 8. | for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. (a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? What type of fund is the <i>private fund</i> ? C hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund © other <i>private</i> fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund © other <i>private</i> fund O securitized asset fund O venture capital fund © other <i>private</i> fund O securitized asset fund O venture capital fund © other <i>private</i> fund O securitized asset fund O venture capital fund © other <i>private</i> fund O securitized asset fund O venture capital fund © other <i>private</i> fund O securitized asset fund O venture capital fund © other <i>private</i> fund O securitized asset fund O venture capital fund | or eac | h of neir ed No © No |

\$ 230,460,573

<u>Ownership</u>

| 12. | Minimum investment commitment required of an investor in the <i>priv</i> \$ 0 | vate fund: | | |
|---|---|---|---|--|
| | NOTE: Report the amount routinely required of investors who are r organizational documents of the fund). | not your <i>related persons</i> (even if different from t | he amount set forth in the | |
| 13. | Approximate number of the <i>private fund's</i> beneficial owners: 35 | | | |
| 14. | What is the approximate percentage of the <i>private fund</i> beneficially 72% | y owned by you and your <i>related persons</i> : | | |
| 15. | (a) What is the approximate percentage of the <i>private fund</i> benefic 0% | cially owned (in the aggregate) by funds of func | ls: | |
| | (b) If the private fund qualifies for the exclusion from the definition Company Act of 1940, are sales of the fund limited to <i>qualified</i> | | | esNo |
| 16. | What is the approximate percentage of the <i>private fund</i> beneficially 0% | y owned by non-United States persons: | | |
| <u>Yoı</u> | ur Advisory Services | | | |
| 17 | | | Y | es No |
| 17. | (a) Are you a subadviser to this <i>private fund</i>? (b) If the answer to question 17.(a) is "yes," provide the name and question 17.(a) is "no," leave this question blank. | d SEC file number, if any, of the adviser of the μ | <i>corivate fund</i> . If the answer to | |
| | 1 | No Information Filed | | |
| | | | Y | es No |
| 18. | (a) Do any investment advisers (other than the investment adviser | · · · · · · · | | 0 |
| | | | | CWOR |
| | (b) If the answer to question 18.(a) is "yes," provide the name and to question 18.(a) is "no," leave this question blank. | d SEC file number, if any, of the other advisers | to the <i>private runu</i> . If the an | 30001 |
| | | d SEC file number, if any, of the other advisers SEC file number | CRD number | |
| | to question 18.(a) is "no," leave this question blank. | | | |
| 10 | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT | SEC file number | CRD number 159458 | es No |
| 19. | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your <i>clients</i> solicited to invest in the private fund? | SEC file number 801-72999 | CRD number 159458 | es No |
| | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT | SEC file number 801-72999 the private fund. | CRD number 159458 Ye | es No |
| 20. | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the solicited in the private funds of a solicited to private funds of a soli | SEC file number 801-72999 the private fund. | CRD number 159458 Ye | es No |
| 20. <u>Pri</u> | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% | SEC file number 801-72999 the private fund. private fund? | CRD number 159458 Ye | es No |
| 20. Pri 21. | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% vate Offering Has the private fund ever relied on an exemption from registration | SEC file number 801-72999 the private fund. private fund? | CRD number 159458 Ye | es No |
| 20. Pri 21. | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% vate Offering | SEC file number 801-72999 the private fund. private fund? | CRD number 159458 Ye | es No |
| 20. Pri 21. | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% vate Offering Has the private fund ever relied on an exemption from registration If yes, provide the private fund's Form D file number (if any): | SEC file number 801-72999 the private fund. private fund? | CRD number 159458 Ye | es No |
| 20. Pri 21. 22. | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% vate Offering Has the private fund ever relied on an exemption from registration If yes, provide the private fund's Form D file number (if any): Form D file number 021-271676 | SEC file number 801-72999 the private fund. private fund? | CRD number 159458 Ye | es No |
| 20. Pri 21. 22. | to question 18. (a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% Vate Offering Has the private fund ever relied on an exemption from registration If yes, provide the private fund's Form D file number (if any): Form D file number | SEC file number 801-72999 the private fund. private fund? | CRD number 159458 Ye | es No |
| 20. Pri 21. 22. B. S | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% vate Offering Has the private fund ever relied on an exemption from registration If yes, provide the private fund's Form D file number (if any): Form D file number 021-271676 | SEC file number 801-72999 the private fund. private fund? | CRD number 159458 Ye ities Act of 1933? | es No |
| 20. Pri 21. 22. B. S <u>Auc</u> | to question 18.(a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% vate Offering Has the private fund ever relied on an exemption from registration If yes, provide the private fund's Form D file number (if any): Form D file number 021-271676 ERVICE PROVIDERS | SEC file number 801-72999 the private fund. private fund? of its securities under Regulation D of the Secur | CRD number 159458 Ye ities Act of 1933? | es No |
| 20. Pri 21. 22. B. S <u>Auc</u> | to question 18. (a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% vate Offering Has the private fund ever relied on an exemption from registration If yes, provide the private fund's Form D file number (if any): Form D file number 021-271676 ERVICE PROVIDERS | SEC file number 801-72999 the private fund. private fund? of its securities under Regulation D of the Secur | CRD number 159458 Ye ities Act of 1933? Ye | es No |
| 20. Pri 21. 22. B. S <u>Auc</u> | to question 18. (a) is "no," leave this question blank. Name of Other Adviser to private fund AUDAX PRIVATE DEBT Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of a Approximately what percentage of your clients has invested in the 1% wate Offering Has the private fund ever relied on an exemption from registration If yes, provide the private fund's Form D file number (if any): Form D file number 021-271676 ERVICE PROVIDERS (a) (1) Are the private fund's financial statements subject to an and | SEC file number 801-72999 the private fund. private fund? of its securities under Regulation D of the Secur Image: secur Image: sec | GAAP? | es No es No es No es No es No es No |

| | lame of the auditing firm: | | | |
|---|---|---|--|-------------------|
| E | RNST & YOUNG LLP | | | |
| (c) T | he location of the auditing | firm's office responsible for the | e <i>private fund's</i> audit (city, state and country): | |
| | ity: | State: | Country: | |
| B | OSTON | Massachusetts | United States | Yes |
| (d) I: | s the auditing firm an <i>indep</i> | endent public accountant? | | © |
| (e) Is | s the auditing firm registere | ed with the Public Company Ad | ccounting Oversight Board? | o |
| | f yes, Public Company Acco 2 | unting Oversight Board-Assigr | ned Number: | |
| | f "yes" to (e) above, is the ccordance with its rules? | auditing firm subject to regula | ar inspection by the Public Company Accounting Oversight Board in | \odot |
| | | | | Y |
| Are the investo | | ncial statements for the most r | recently completed fiscal year distributed to the private fund's | |
| Do all o | f the reports prepared by t | he auditing firm for the private | e fund since your last annual updating amendment contain unqualified | opini |
| Yes | O No O Report Not Yet R | eceived | | |
| If you c | heck "Report Not Yet Receiv | ed," you must promptly file an | amendment to your Form ADV to update your response when the report | is av |
| fund use | es more than one prime bro | oker, you must complete ques | stions (b) through (e) separately for each prime broker. | |
| | | N | o Information Filed | |
| If the a <i>fund</i> use | nswer to question 25.(a) is es more than one custodiar | odians (including the prime br s "yes," respond to questions on h, you must complete question | o Information Filed rokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> uses. If the ns (b) through (g) separately for each custodian. | Y priva |
| Does th If the a <i>fund</i> use | nswer to question 25.(a) is | odians (including the prime br s "yes," respond to questions on h, you must complete question | rokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> uses. If the | |
| Does the fund use Additic | nswer to question 25.(a) is es more than one custodiar onal Custodian Informatio e answer to question 25.(a) uses more than one custod | odians (including the prime br s "yes," respond to questions o n, you must complete question n : 1 Record(s) Filed. is "yes," respond to question | rokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> uses. If the | priva |
| Does the a fund use Additic If the fund use fu | nswer to question 25.(a) is es more than one custodiar onal Custodian Informatio answer to question 25.(a) | odians (including the prime br s "yes," respond to questions o n, you must complete question n : 1 Record(s) Filed. is "yes," respond to question | rokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> uses. If the ns (b) through (g) separately for each custodian. (b) through g) below for each custodian the <i>private fund</i> uses. If th | priva |
| Does the If the a <i>fund</i> use Additic If the <i>fund</i> u (b) Le B (c) P | nswer to question 25.(a) is es more than one custodiar onal Custodian Informatio e answer to question 25.(a) uses more than one custod egal name of custodian: | odians (including the prime br s "yes," respond to questions on n, you must complete question n : 1 Record(s) Filed. is "yes," respond to question ian, you must complete quest | rokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> uses. If the ns (b) through (g) separately for each custodian. (b) through g) below for each custodian the <i>private fund</i> uses. If th | priva |
| Does the If the a <i>fund</i> use Additic If the <i>fund</i> u (b) Lu (c) P B | nswer to question 25. (a) is es more than one custodiar onal Custodian Informatio answer to question 25. (a) uses more than one custod egal name of custodian: ANK OF AMERICA, N.A. rimary business name of cu | odians (including the prime br s "yes," respond to questions on n, you must complete question n : 1 Record(s) Filed. is "yes," respond to question ian, you must complete quest | rokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> uses. If the ns (b) through (g) separately for each custodian. (b) through g) below for each custodian the <i>private fund</i> uses. If th | priva |
| Does the If the a <i>fund</i> use Additic If the <i>fund</i> u (b) Lu (b) Lu (c) P B (d) T C | nswer to question 25. (a) is es more than one custodiar conal Custodian Informatio e answer to question 25. (a) uses more than one custod egal name of custodian: ANK OF AMERICA, N.A. rimary business name of cu ANK OF AMERICA, N.A. he location of the custodiar ity: | odians (including the prime br s "yes," respond to questions of n, you must complete question n : 1 Record(s) Filed. is "yes," respond to question ian, you must complete quest ustodian: n's office responsible for <i>custo</i> State: | rokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> uses. If the ns (b) through (g) separately for each custodian. s (b) through g) below for each custodian the <i>private fund</i> uses. If the ions (b) through (g) separately for each custodian. bdy of the <i>private fund's</i> assets (city, state and country): Country: | priva |
| Does the If the a <i>fund</i> use Additic If the <i>fund</i> u (b) Lu (b) Lu (c) P B (d) T C | nswer to question 25. (a) is es more than one custodiar onal Custodian Informatio e answer to question 25. (a) uses more than one custod egal name of custodian: ANK OF AMERICA, N.A. rimary business name of cu ANK OF AMERICA, N.A. he location of the custodiar | odians (including the prime br s "yes," respond to questions of n, you must complete question n : 1 Record(s) Filed. is "yes," respond to question ian, you must complete quest ustodian: | rokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> uses. If the ns (b) through (g) separately for each custodian. Is (b) through g) below for each custodian the <i>private fund</i> uses. If the ions (b) through (g) separately for each custodian. | priva |

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

Administrator

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

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

| dditional Administr | ator Information : 1 Record(s) Filed. | | |
|----------------------|--|--|------------|
| | estion 26.(a) is "yes," respond to questions (b nust complete questions (b) through (f) separ | b) through (f) below. If the <i>private fund</i> uses more rately for each administrator. | e than one |
| (b) Name of adminis | strator: | | |
| AUDAX GROUP | | | |
| (c) Location of adm | inistrator (city, state and country): | | |
| City: | State: | Country: | |
| BOSTON | Massachusetts | United States | |
| | | | Yes No |
| (d) Is the administr | ator a <i>related person</i> of your firm? | | 00 |
| (e) Does the admin | istrator prepare and send investor account s | tatements to the <i>private fund's</i> investors? | |
| € Yes (provided | to all investors) \bigcirc Some (provided to some | but not all investors) ${igcar_{igar}ignar_{igcar_{igcar_{igcar_{igar}igar_{igar}ignar}ignar_{ignar}ignar_{igar}ignar_{igar}ignar_{igar}ignar_{igar}ignar_{ignar}ignar_{ignar}ignar_{igar}ignar_{ignar}ignar_{ignar}ignar}ignar}ignar}ignar_{ignar}ignar}ignar}} \ignar} \ignarry in ignarry ignarry i} \ignarry i} hord in hord in hord} hord in hord hord in hord hord hord hord hord hord hord hord$ | stors) |
| | e question 26.(e) is "no" or "some," who send restor account statements are not sent to the | Is the investor account statements to the (rest o | |

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

100%

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

Marketers

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

Yes No

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

| No Information Filed |
|-------------------------------------|
| |
| Funds per Page: 15 🔽 Total Funds: 9 |
| |

SECTION 7.B.(2) Private Fund Reporting

No Information Filed

Item 8 Participation or Interest in Client Transactions

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

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

the receipt of sales commissions as a broker or registered representative of a broker-dealer)?

| Pro | oprietary Interest in Client Transactions | | |
|-----|--|---------|---------|
| A. | Do you or any related person: | Yes | No |
| | (1) buy securities for yourself from advisory clients, or sell securities you own to advisory clients (principal transactions)? | 0 | \odot |
| | (2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients? | \odot | 0 |
| | (3) recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))? | o | 0 |

Sales Interest in Client Transactions

| В. | B. Do you or any related person: | | No | |
|----|---|---------|---------|--|
| | (1) as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)? | 0 | \odot | |
| | (2) recommend to advisory clients, or act as a purchaser representative for advisory clients with respect to, the purchase of securities for | \odot | 0 | |

(3) recommend purchase or sale of securities to advisory *clients* for which you or any *related person* has any other sales interest (other than or content)

| ١n | Investment or Brokerage Discretion | | | |
|----|--|-------------------------|-----|---------|
| C. | C. Do you or any <i>related person</i> have <i>discretionary authority</i> to determine the: | Y | 'es | No |
| | (1) securities to be bought or sold for a <i>client's</i> account? | (| o | \circ |
| | (2) amount of securities to be bought or sold for a <i>client's</i> account? | (| o | 0 |
| | (3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account? | (| o | 0 |
| | (4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions? | c | • | 0 |
| D. | D. If you answer "yes" to C.(3) above, are any of the brokers or dealers <i>related persons</i> ? | (| 0 | o |
| E. | E. Do you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ? | c | • | 0 |
| F. | F. If you answer "yes" to E. above, are any of the brokers or dealers <i>related persons</i> ? | (| 0 | o |
| G. | G. (1) Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a ("soft dollar benefits") in connection with <i>client</i> securities transactions? | third party | o | 0 |
| | (2) If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage s section 28(e) of the Securities Exchange Act of 1934? | ervices" under | • | 0 |
| H. | H. (1) Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals? | (| 0 | \odot |
| | (2) Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)? | ig <i>clients</i> for | o | 0 |
| I. | I. Do you or any <i>related person</i> , including any <i>employee</i> , directly or indirectly, receive compensation from any <i>person</i> (other than you <i>person</i>) for <i>client</i> referrals? | u or any <i>related</i> | 0 | o |

In your response to Item 8.1., do not include the regular salary you pay to an employee.

In responding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.

Item 9 Custody

In this Item, we ask you whether you or a *related person* has *custody* of *client* (other than *clients* that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices.

A. (1) Do you have *custody* of any advisory *clients'*:

(a) cash or bank accounts?

(b) securities?

If you are registering or registered with the SEC, answer "No" to Item 9.A. (1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.

Yes No

 \circ

 \circ

 \odot

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(2) If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which you have custody:

| U.S. Dollar Amount | Total Number of Clients |
|--------------------|-------------------------|
| (a) \$ 390,082,758 | (b) 4 |

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

| В. | (1) | In connection with advisory services you provide to clients, do any of your related persons have custody of any of your advisory clients': | Yes | No |
|----|-----|--|---------|----|
| | | (a) cash or bank accounts? | \odot | 0 |
| | | (b) securities? | \odot | 0 |

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

(2) If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which your related persons have custody:

| U.S. Dollar Amount | Total Number of Clients |
|--------------------|-------------------------|
| (a) \$ 390,082,758 | (b) 4 |

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

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

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

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

- E. If you are filing your annual updating amendment and you were subject to a surprise examination by an independent public accountant during your last fiscal year, provide the date (MM/YYYY) the examination commenced:
- F. If you or your related persons have custody of client funds or securities, how many persons, including, but not limited to, you and your related persons, act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*? 3

SECTION 9.C. Independent Public Accountant

No Information Filed

Item 10 Control Persons

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

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

Α. Does any person not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, control your management or policies? B. If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

SECTION 10.A. Control Persons

No Information Filed

SECTION 10.B. Control Person Public Reporting Companies

No Information Filed

Item 11 Disclosure Information

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

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

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.

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

| | | Yes | sΝ |
|-----|---|---------|------|
| Do | any of the events below involve you or any of your supervised persons? | 0 | 6 |
| For | "yes" answers to the following questions, complete a Criminal Action DRP: | | |
| Α. | In the past ten years, have you or any advisory affiliate: | Yes | s Ne |
| | (1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony? | 0 | C |
| | (2) been <i>charged</i> with any <i>felony</i> ? | 0 | o |
| | | | |
| | If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) charges that are currently pending. | to | |
| В. | 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 | |
| В. | If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) charges that are currently pending. | to O | G |

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.

| Fo | r "yes" answers to the following questions, complete a Regulatory Action DRP: | | | |
|----|---|------|-----|--------------------|
| C. | Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: | Y | 'es | No |
| | (1) found you or any advisory affiliate to have made a false statement or omission? | C | D | \odot |
| | (2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes? | C | 0 | \odot |
| | (3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denie suspended, revoked, or restricted? | d, C | 0 | o |
| | (4) entered an order against you or any advisory affiliate in connection with investment-related activity? | C | D | \odot |
| | (5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activit | y? C | 0 | $oldsymbol{\circ}$ |

D. Has any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority*:

| | (1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical? | 0 | \odot |
|-----|--|-----|---------|
| | (2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes? | 0 | \odot |
| | (3) ever found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted? | 0 | O |
| | (4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related activity? | 0 | \odot |
| | (5) ever denied, suspended, or revoked your or any advisory affiliate's registration or license, or otherwise prevented you or any advisory affiliate, by order, from associating with an investment-related business or restricted your or any advisory affiliate's activity? | 0 | O |
| E. | Has any self-regulatory organization or commodities exchange ever: | | |
| | (1) found you or any advisory affiliate to have made a false statement or omission? | 0 | \odot |
| | (2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)? | 0 | \odot |
| | (3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted? | 0 | \odot |
| | (4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities? | 0 | © |
| F. | Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or suspended? | 0 | ۲ |
| G. | Are you or any <i>advisory affiliate</i> now the subject of any regulatory <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.? | 0 | © |
| For | "yes" answers to the following questions, complete a Civil Judicial Action DRP: | | |
| H. | (1) Has any domestic or foreign court: | Yes | No |
| | (a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity? | 0 | \odot |
| | (b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations? | 0 | \odot |
| | | | |

- (c) ever dismissed, pursuant to a settlement agreement, an *investment-related* civil action brought against you or any *advisory affiliate* by a state or *foreign financial regulatory authority*?
- (2) Are you or any advisory affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?

Item 12 Small Businesses

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

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

For purposes of this Item 12 only:

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

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

Schedule A

Direct Owners and Executive Officers

- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:
 - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer(Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
 - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);
 - Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
 - (c) if you are organized as a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
 - (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
 - (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
- 3. Do you have any indirect owners to be reported on Schedule B? Yes No
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
- 5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: NA less than 5% B 10% but less than 25% D 50% but less than 75%
 - A 5% but less than 10% C 25% but less than 50% E 75% or more
- 7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

| FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name) | DE/FE/I | Title or Status | Date Title or Status Acquired MM/YYYY | · · | Control Person | | <i>CRD</i> No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No. |
|--|---------|---------------------------------------|--|-----|-------------------|---|--|
| MINOPOLI, ANTHONY, VINCENT | I | PRESIDENT AND CHIEF | 01/2015 | NA | Y | N | 2317218 |
| KNIGHTS OF COLUMBUS ASSET ADVISORS HOLDCO LLC | DE | MEMBER | 10/2014 | E | Y | N | |
| VOTTO, MICHAEL, PATRICK | I | VICE PRESIDENT AND SPECIAL COUNSEL | 01/2015 | NA | N | N | 6435415 |
| MARCHAND, GILLES, ALFRED | I | VICE PRESIDENT, PORTFOLIO MANAGER | 01/2015 | NA | N | N | 1540226 |
| Kirwan, Timothy, Francis | 1 | CHIEF COMPLIANCE OFFICER | 10/2019 | NA | N | Ν | 7051961 |

Schedule B

- Indirect Owners
- 1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
- 2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
 - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

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

- (b) in the case of an owner that is a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
- (c) in the case of an owner that is a trust, the trust and each trustee; and
- (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
- 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
- 5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).

- 6. Ownership codes are: C 25% but less than 50%
- 0% E 75% or more
 - D 50% but less than 75% F Other (general partner, trustee, or elected manager)
- 7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

| FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name) | DE/FE/I | Entity in Which Interest is Owned | | | • | Control Person | | <i>CRD</i> No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No. |
|--|---------|---|--------|---------|---|-------------------|---|--|
| KNIGHTS OF COLUMBUS | DE | KNIGHTS OF COLUMBUS ASSET ADVISORS HOLDCO LLC | MEMBER | 09/2014 | E | Y | N | |

Schedule D - Miscellaneous

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

As of the date of this filing, certain of the private funds have no assets and have not commenced trading. Note that with respect to the chart relating to items 5.d(a) and 5.d(d), the Amount of Regulatory Assets Under Management assigned to 5.d(a) has been subsequently removed from 5.d(d). Item 5.d(a) reflects the number of accounts and assets in the IAR Program as of the prior year end date. Per the ADV instructions and in order to avoid double counting of assets, a portion of the AUM for 5.d(d) is reflected in 5.d(a) which represents the underlying Investment Companies held in these accounts. See our ADV Part 2a for more information on the IAR Program.

Schedule R

No Information Filed

DRP Pages

CRIMINAL DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

Part 2

Exemption from brochure delivery requirements for SEC-registered advisers

SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to *all* of your advisory clients, you do not have to prepare a brochure.

Yes No

0 0

Are you exempt from delivering a brochure to all of your clients under these rules?

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

| Brochure ID | Brochure Name | Brochure Type(s) |
|-------------|-----------------------------------|--|
| 125896 | KNIGHTS OF COLUMBUS ASSET | Individuals, High net worth individuals, Pension |
| | ADVISORS LLC ADV PART 2A BROCHURE | plans/profit sharing plans, Pension consulting, |
| | 3.30.2024 | Foundations/charities, Government/municipal, Other |
| | | institutional, Private funds or pools, Wrap program, |
| | | Other |

| Part 3 | | | | |
|--------|--------------------|----------------|--------|--|
| CRS | Type(s) | Affiliate Info | Retire | |
| Å | Investment Advisor | | | |

Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

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

Appointment of Agent for Service of Process

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

Signature

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

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

Signature: TIMOTHY KIRWAN Printed Name: TIMOTHY KIRWAN Adviser *CRD* Number: 174129 Date: MM/DD/YYYY 03/29/2024 Title: CHIEF COMPLIANCE OFFICER

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

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

1. Appointment of Agent for Service of Process

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

2. Appointment and Consent: Effect on Partnerships

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

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

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

Signature

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

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

Signature:

Printed Name:

Date: MM/DD/YYYY Title:

Adviser *CRD* Number: 174129