FORM ADV

CRD Number: 131556 Rev. 10/2021

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

Primary Business Name: EPOCH INVESTMENT PARTNERS, INC.

Annual Amendment - All Sections

(3) Telephone number at this location:

212-303-7200

1/28/2025 4:55:28 PM

WA	•	•	·	of your application, revocation of your registration, or criminal te Form ADV General Instruction 4.		
Iter	m 1 Identifying Information					
info			=	ntact you. If you are filing an <i>umbrella registration</i> , the ides information to assist you with filing an <i>umbrella</i>		
A.	. Your full legal name (if you are a sole proprietor, your last, first, and middle names): EPOCH INVESTMENT PARTNERS, INC.					
В.	(1) Name under which you p EPOCH INVESTMENT PART		sory business, if different from Iter	m 1.A.		
	List on Section 1.B. of Sched	ule D any additional name	s under which you conduct your ac	dvisory business.		
	(2) If you are using this Form	n ADV to register more tha	an one investment adviser under a	n $umbrella\ registration$, check this box \square		
	If you check this box, comple	ete a Schedule R for each i	relying adviser.			
C.	If this filing is reporting a change change is of ☐ your legal name or ☐ you		tem 1.A.) or primary business nam	ne (Item $1.B.(1)$), enter the new name and specify whether the		
D.	(1) If you are registered with(2) If you report to the SEC a		t adviser, your SEC file number: 8 (viser, your SEC file number:	01-63118		
	() , .	, , ,	rs assigned by the SEC ("CIK Numb	pers"), all of your CIK numbers:		
			No Information Filed			
E.				e IARD system, your <i>CRD</i> number: 131556		
	If your firm does not have a	CRD number, skip this Itel	m 1.E. Do not provide the CRD nui	mber of one of your officers, employees, or affiliates.		
	(2) If you have additional CR	D Numbers, your addition	al CRD numbers:			
			No Information Filed			
F.	Principal Office and Place of L	Business				
	(1) Address (do not use a P.	O. Box):				
	Number and Street 1:		Number and Street 2:			
	1 VANDERBILT AVENUE	Chahai	23RD FLOOR	710 4 4 /0-4-1 C-4-1		
	City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10017		
	If this address is a priva	te residence, check this bo	ox: 🗆			
	business. If you are appositate or states to which registered only with the	lying for registration, or ar you are applying for regist SEC, or if you are reportin	re registered, with one or more sta tration or with whom you are regis	ce of business, at which you conduct investment advisory te securities authorities, you must list all of your offices in the tered. If you are applying for SEC registration, if you are ing adviser, list the largest twenty-five offices in terms of		
	(2) Days of week that you n	ormally conduct business	at your <i>principal office and place o</i>	f business:		
	⊙ Monday - Friday 🤼 O					
	Normal business hours a 8:30 AM - 5:30 PM	t this location:				

	(4) Facsimile number at t 212-202-4948(5) What is the total num the end of your most 2	ber of offices, other		cipal office and place o	of business, at wh	nich you conduct investn	nent advisory busine	ess as of	
_	Mailing address, if differen	t from your princing	l office and pla	so of husiness address	.,				
G.	Number and Street 1:	it iroin your <i>principa</i> .	i onice and pia	Number and Stre					
	City:	State:		Country:		4/Postal Code:			
	City.	State.		Country.	211 17	y i ostai code.			
	If this address is a private	e residence, check th	nis box: \square						
н.	If you are a sole proprieto	r, state your full resi	dence address,	if different from your	principal office a	nd place of business add	dress in Item 1.F.:		
	Number and Street 1:			Number and Stre	et 2:				
	City:	State:		Country:	ZIP+4	4/Postal Code:			
								Yes No	
I.	Do you have one or more LinkedIn)?	websites or accounts	s on publicly av	ailable social media pl	atforms (includin	g, but not limited to, Tw	vitter, Facebook and	⊙ ○	
	If "yes," list all firm website Schedule D. If a website a without listing addresses f or accounts on publicly ava addresses of employees of	ddress serves as a p or all of the other inf ailable social media p	oortal through w formation. You platforms wher	which to access other in may need to list more the you do not control th	information you h e than one portal he content. Do no	nave published on the wa address. Do not provide ot provide the individual	eb, you may list the e the addresses of w	portal ebsites	
J.	Chief Compliance Officer	contact information	of your Chief C	Compliance Officer If w	rou are an evern	nt reporting advicer you	ı must provide the s	ontact	
		(1) Provide the name and contact information of your Chief Compliance Officer. If you are an exempt reporting adviser, you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.							
	Name: DAVID BARNETT			Other titles, if any: CHIEF COMPLIANCE	OFFICER				
	Telephone number:			Facsimile number, if any:					
	212-991-5408				-				
	Number and Street 1: 1 VANDERBILT AVENUE			Number and Street 2 23RD FLOOR	2:				
	City: NEW YORK	State: New York		Country: United States		ZIP+4/Postal Code: 10017			
	Electronic mail (e-mail) a DBARNETT@EIPNY.COM	ddress, if Chief Com	pliance Officer	has one:					
	(2) If your Chief Complian under the Investment Com Employer Identification Nu Name:	npany Act of 1940 th imber (if any):				•		-	
	IRS Employer Identificatio	n Number:							
K.	Additional Regulatory Contact Person: If a person other than the Chief Compliance Officer is authorized to receive information and respond to questions about this Form ADV, you may provide that information here.								
	Name: DAVID SHAGAWAT		Titles: DIRECTOR	, DEPUTY CHIEF COMP	LIANCE OFFICER	L.			
	Telephone number: 212-303-7200		Facsimile n	number, if any:					
	Number and Street 1: Number at 1 VANDERBILT AVENUE 23RD FLO		nd Street 2: OR						
	City: NEW YORK	State: New York	Country: United Sta	tes	ZIP+4/ 10017	Postal Code:			
	Electronic mail (e-mail) a DSHAGAWAT@EIPNY.COM	· · · · · · · · · · · · · · · · · · ·	rson has one:						
								Yes No	
L.	Do you maintain some or a somewhere other than you		•		er Section 204 of	f the Advisers Act, or sir	milar state law,	• c	

If "yes," complete Section 1.L. of Schedule D.

Are you registered w			Yes
. Are you registered w	vith a foreign financial regulatory auth	ority?	•
	ore not registered with a foreign finance . If "yes," complete Section 1.M. of Sc		e an affiliate that is registered with a foreign financia
			Yes
. Are you a public rep	orting company under Sections 12 or	15(d) of the Securities Exchange Act of 1	.934? C
			Yes
If yes, what is the a	ion or more in assets on the last day opproximate amount of your assets:	of your most recent fiscal year?	c
C \$1 billion to les	s than \$10 billion		
C \$10 billion to le	ess than \$50 billion		
C \$50 billion or m	nore		
	n 1.O. only, "assets" refers to your tot s shown on the balance sheet for you		nage on behalf of clients. Determine your total asset
Provide your <i>Legal E</i> 549300FT720Z0BVC	Entity Identifier if you have one:		
A legal entity identif	ier is a unique number that companie	s use to identify each other in the financi	al marketplace. You may not have a <i>legal entity</i>
identifier.	ior is a unique number that companie.	s use to identify each other in the initiality	ar marketplace. Tod may not have a regar enary
CTION 1.B. Other Bu	siness Names		
ist your other business	names and the jurisdictions in which	you use them. You must complete a sepa	rrate Schedule D Section 1.B. for each business
ame.			
lame: TD ASSET MANA	GEMENT		
ame: TD ASSET MANA	GEMENT		
	GEMENT		
ırisdictions		▽ NE	√ sc
risdictions	GEMENT ☑ IL ☑ IN	₩ NE	☑ SC ☑ SD
ırisdictions ▼ AL ▼ AK	☑ IL ☑ IN	☑ NV	☑ SD
ırisdictions ✓ AL ✓ AK ✓ AZ	☑ IL ☑ IN ☑ IA	☑ NV ☑ NH	☑ SD ☑ TN
risdictions AL AK AZ AZ	☑ IL ☑ IN ☑ IA ☑ KS	☑ NV ☑ NH ☑ NJ	☑ SD ☑ TN ☑ TX
risdictions AL AK AZ AZ AR CA	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY	☑ NV ☑ NH ☑ N ☑ M	☑ SD ☑ TN ☑ TX ☑ UT
risdictions AL AK AZ AR CA CA	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY ☑ LA	☑ NV ☑ NH ☑ NJ ☑ NM ☑ NY	☑ SD ☑ TN ☑ TX ☑ UT ☑ VT
risdictions AL AK AZ AR CAR CO	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY ☑ LA ☑ ME	✓ NV ✓ NH ✓ NJ ✓ NM ✓ NY ✓ NC	☑ SD ☑ TN ☑ TX ☑ UT ☑ VT ☑ VI
Irisdictions AL AK AZ AR CA CO CT	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY ☑ LA ☑ ME ☑ MD	☑ NV ☑ NH ☑ NJ ☑ NM ☑ NY ☑ NC ☑ ND	☑ SD ☑ TN ☑ TX ☑ UT ☑ VT ☑ VI ☑ VA
Irisdictions AL AK AZ AR CA CO CT	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY ☑ LA ☑ ME	✓ NV ✓ NH ✓ NJ ✓ NM ✓ NY ✓ NC	☑ SD ☑ TN ☑ TX ☑ UT ☑ VT ☑ VI
Irisdictions AL AK AZ AR CA CO CO CT DE	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY ☑ LA ☑ ME ☑ MD	☑ NV ☑ NH ☑ NJ ☑ NM ☑ NY ☑ NC ☑ ND	☑ SD ☑ TN ☑ TX ☑ UT ☑ VT ☑ VI ☑ VA
Irisdictions AL AK AZ AR CA CO CT DE DC	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY ☑ LA ☑ ME ☑ MD ☑ MA	☑ NV ☑ NH ☑ NJ ☑ NM ☑ NY ☑ NC ☑ ND ☑ OH	✓ SD ✓ TN ✓ TX ✓ UT ✓ VT ✓ VI ✓ VA ✓ WA
Irrisdictions AL AK AZ AR CA CO CT DE DC FL GAA	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY ☑ LA ☑ ME ☑ MD ☑ MA ☑ MI	☑ NV ☑ NH ☑ NJ ☑ NM ☑ NY ☑ NC ☑ ND ☑ OH ☑ OK	✓ SD ✓ TN ✓ TX ✓ UT ✓ VT ✓ VI ✓ VA ✓ WA ✓ WV
Irrisdictions AL AK AZ AR CA CO CT DE DC FL GA GU	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY ☑ LA ☑ ME ☑ MD ☑ MA ☑ MI ☑ MN ☑ MN	✓ NV ✓ NH ✓ NJ ✓ NM ✓ NY ✓ NC ✓ ND ✓ OH ✓ OK ✓ OR ✓ PA	✓ SD ✓ TN ✓ TX ✓ UT ✓ VT ✓ VI ✓ VA ✓ WA ✓ WA ✓ WV ✓ WI ✓ WY
Irrisdictions AL AK AZ AR CA CO CT DE DC FL GA GU HI	☑ IL ☑ IN ☑ IA ☑ KS ☑ KY ☑ LA ☑ ME ☑ MD ☑ MA ☑ MI ☑ MN	INV INH INJ INM INNY INC INC IND INO	SD TN TX UT VI VA WW WW WW WW WW
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urisdictions ✓ AL ✓ AK ✓ AZ ✓ AR ✓ CA ✓ CO ✓ CT ✓ DE ✓ DC ✓ FL ✓ GA ☐ GU ✓ HI ✓ ID ist your other business ame.	IL IN IN IA IN KS KY KY ILA IM ME MD IM MA IM MI IM MN IM MN IM MS IM MO IM MT	✓ NV ✓ NH ✓ NJ ✓ NM ✓ NY ✓ NC ✓ ND ✓ OH ✓ OK ✓ OR ✓ PA ☐ PR ✓ RI	✓ SD ✓ TN ✓ TX ✓ UT ✓ VT ✓ VI ✓ VA ✓ WA ✓ WV ✓ WV ✓ WI ✓ WY ✓ Other:
AL AK AZ AR CA CA CO CT DE DC CT DC TL DC TL TO	IL IN IN IA IN KS KY KY ILA IM ME MD IM MA IM MI IM MN IM MN IM MS IM MO IM MT	✓ NV ✓ NH ✓ NJ ✓ NM ✓ NY ✓ NC ✓ ND ✓ OH ✓ OK ✓ OR ✓ PA ☐ PR ✓ RI	✓ SD ✓ TN ✓ TX ✓ UT ✓ VT ✓ VI ✓ VA ✓ WA ✓ WV ✓ WV ✓ WI ✓ WY ✓ Other:
AL AK AZ AR CA CA CO CT DE DC CT DC CT DC TD	IL IN IN IA IN KS KY KY ILA IM ME MD IM MA IM MI IM MN IM MN IM MS IM MO IM MT	✓ NV ✓ NH ✓ NJ ✓ NM ✓ NY ✓ NC ✓ ND ✓ OH ✓ OK ✓ OR ✓ PA ☐ PR ✓ RI ✓ RI you use them. You must complete a sepa	✓ SD ✓ TN ✓ TX ✓ UT ✓ VT ✓ VI ✓ VA ✓ WA ✓ WV ✓ WV ✓ WI ✓ WY ✓ Other:
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urisdictions ✓ AL ✓ AK ✓ AZ ✓ AR ✓ CO ✓ CT ✓ DE ✓ DC ✓ FL ✓ GA ☐ GU ✓ HI ✓ ID ist your other business ame. lame: TD EPOCH urisdictions	IL IN IN IA KS KY KY LA ME MD MA MI MN MS MN MS MO MT MT	✓ NV ✓ NH ✓ NJ ✓ NM ✓ NY ✓ NC ✓ ND ✓ OH ✓ OK ✓ OR ✓ PA ☐ PR ✓ RI ✓ RI you use them. You must complete a sepa	▼ SD ▼ TN ▼ TX ▼ UT ▼ VT □ VI ▼ VA ▼ WA ▼ WV ▼ WI ▼ WY □ Other:
urisdictions AL AK AZ AR CA CO CO CT DE DC FL GA GU HI DI	IL IN IN IN IA KS KY KY LA ME MD MM MI MN MS MN MS MO MT MT IL IL	✓ NV ✓ NH ✓ NJ ✓ NM ✓ NY ✓ NC ✓ ND ✓ OH ✓ OK ✓ OR ✓ PA ☐ PR ✓ RI ✓ RI ✓ NE	▼ SD ▼ TN ▼ TX ▼ UT ▼ VT □ VI ▼ VA ▼ WA ▼ WV ▼ WI ▼ WY □ Other:
Name: TD ASSET MANAGOURISDICTIONS AL AK AZ AR CO CO CT DE DC FL GA GU HI DI DI List your other business name. Name: TD EPOCH Jurisdictions AL AK AZ AZ AR	IL IN IN IA KS KY KY LA WME MD MA MM MN MS MN MS MO MT MI MO MT IL III III	✓ NV ✓ NH ✓ NJ ✓ NM ✓ NY ✓ NC ✓ ND ✓ OH ✓ OK ✓ OR ✓ PA ✓ PR ✓ PR ✓ RI ✓ RI ✓ NU ✓ NU ✓ NU ✓ NU ✓ NU ✓ NU ✓ NU ✓ N	I SD I TN I TX I UT I VI I VA I WA I WV I WY I Other: Other: SC I SD

☑ CA	 ☑ KY	☑ NM	 ☑ UT
☑ co	☑ LA	☑ NY	☑ VT
Г ст	☑ ME	☑ NC	□ VI
☑ DE	☑ MD	☑ ND	☑ VA
☑ DC	☑ MA	Г он	☑ WA
☑ FL	☑ MI	Г ок	☑ w∨
☑ GA	☑ MN	☑ OR	☑ wɪ
□gu	▼ MS	₽ PA	₩ wY
⊠HI	™ MO	□ PR	Other:
☑ ID	✓ MT	☑ RI	
		V	
List your other business names name.	; and the jurisdictions in which you use th	em. You must complete a s	eparate Schedule D Section 1.B. for each business
Name: TD GLOBAL INVESTMEN	NT SOLUTIONS ("TDGIS")		
Jurisdictions			
✓ AL	☑ IL	☑ NE	₽ sc
✓ AK	₩ IN	₩ NE W NV	✓ SC ✓ SD
✓ AZ	₩ IA	₩ NH	
			▼ TN
☑ AR	☑ KS	☑ NJ	☑ TX
☑ CA	☑ KY	☑ NM	☑ UT
☑ co	☑ LA	☑ NY	☑ VT
☑ CT	☑ ME	☑ NC	□ VI
☑ DE	₩ MD	☑ ND	▽ VA
☑ DC	☑ MA	Г ОН	☑ WA
☑ FL	☑ MI	Г ок	☑ w∨
☑ GA	☑ MN	☑ OR	☑ wɪ
□GU	☑ MS	₽ PA	☑ wy
⊡ ні	™ MO	□ PR	☐ Other:
☑ ID	☑ MT	₽ RI	
			JI.
ECTION 1.F. Other Offices			
business. You must complete a		h location. If you are apply	iness, at which you conduct investment advisory ing for SEC registration, if you are registered only wit s of numbers of employees).
Number and Street 1: LEVEL 2, 161 COLLINS STREET	г	Number and Stre	et 2:
City: MELBOURNE	State:	Country: Australia	ZIP+4/Postal Code: VIC 3000
If this address is a private resid	dence, check this box: \Box		
Telephone Number: 61 405 136 461	Facsimile N	Number, if any:	
	quired to be registered with FINRA or a <i>sta</i> Office Registration Form (Form BR), pleas		branch office location for a broker-dealer or investm Number here:

(2) Bank (including a separately identifiable department or division of a bank)
(3) Insurance broker or agent

 \square (1) Broker-dealer (registered or unregistered)

1

How many $\emph{employees}$ perform investment advisory functions from this office location?

Are other business activities conducted at this office location? (check all that apply)

 (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 <i>investment-related</i> business activities conducted from this office location:					
Complete the following information for each office, other than your <i>principal office and place of business</i> , 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 <i>exempt reporting adviser</i> , list only the largest twenty-five offices (in terms of numbers of <i>employees</i>).					
Number and Street 1: 161 BAY STREET		umber and Street 2: TH FLOOR, TD CANADA T	RUST TOWER		
City:		ountry:	ZIP+4/Postal Code:		
TORONTO	Ca	ınada	M5J 2T2		
If this address is a private residence, check this box	x: □				
Telephone Number: 888-834-6339	Facsimile Number, if	fany:			
If this office location is also required to be registere adviser on the Uniform Branch Office Registration F		•	a branch office location for a broker-dealer or investment n Number here:		
How many <i>employees</i> perform investment advisory 77	functions from this o	ffice location?			
Are other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) (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					
SECTION 1.I. Website Addresses					
		· ·	atforms where you control the content (including, but not 1.I. for each website or account on a publicly available		
Address of Website/Account on Publicly Available So	ocial Media Platform:	https://TWITTER.COM/I	EPOCHINVEST		
Address of Website/Account on Publicly Available So	ocial Media Platform:	https://www.TDASSETN	MANAGEMENT.COM		
Address of Website/Account on Publicly Available So	ocial Media Platform:	http://TDGIS.COM			
Address of Website/Account on Publicly Available Social Media Platform: http://www.LINKEDIN.COM/COMPANY/EPOCHINVEST					

Complete the following information for each location at which you keep your books and records, other than your <i>principal office and place of business</i> . You must complete a separate Schedule D, Section 1.L. for each location.						
Name of entity where books and records are kept SALESFORCE.COM, INC.	:					
Number and Street 1: THE LANDMARK @ ONE MARKET STREET		Number and Street 2:				
	State:	Country:	ZIP+4/Postal Code:			
City: SAN FRANCISCO	California	United States	94015			
If this address is a private residence, check this b	ox:					
Telephone Number: 415-901-7000	Facsimile numbe	er, if any:				
This is (check one):						
O one of your branch offices or affiliates.						
a third-party unaffiliated recordkeeper.						
C other.						
Briefly describe the books and records kept at thi CLIENT RELATIONSHIP MANAGEMENT SOLUTION						
Name of entity where books and records are kept FINANCIAL TRACKING TECHNOLOGIES, LLC	:					
Number and Street 1: 111 EAST PUTNAM AVENUE		Number and Street 2: SUITE 304				
•	State: Connecticut	Country: United States	ZIP+4/Postal Code: 06878			
If this address is a private residence, check this b	ox:					
Telephone Number: 203-340-2356	Facsimile number, if any:					
This is (check one):						
$^{ extsf{C}}$ one of your branch offices or affiliates.						
• a third-party unaffiliated recordkeeper.						
C other.						
Briefly describe the books and records kept at thi PERSONAL TRADING RECORDS	s location.					
Name of entity where books and records are kept SPRINKLR	:					
Number and Street 1: 29 WEST 35TH STREET		Number and Street 2:				
City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10001			
If this address is a private residence, check this b	oox:					
Telephone Number: 917-933-7800	Facsimile number, if any	y:				

This is (check one):			
O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
C other.			
Briefly describe the books and records kept at RECORDS RELATING TO MARKETING AND SOC			
Name of entity where books and records are keep PAGEFREEZER	ept:		
Number and Street 1: 311 WATER STREET		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
VANCOUVER		Canada	V6B 1B8
If this address is a private residence, check thi	s box:		
Telephone Number: 888-916-3999	Facsimile number	; if any:	
This is (check one):			
C one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
O other.			
WEBSITE AND SOCIAL MEDIA ARCHIVING Name of entity where books and records are ke	ent.		
NEW YORK LIFE INVESTMENT MANAGEMENT L	-		
Number and Street 1:		Number and Street 2:	
30 HUDSON STREET			
City:	State:	Country:	ZIP+4/Postal Code:
JERSEY CITY	New Jersey	United States	07302
If this address is a private residence, check thi	s box: □		
Telephone Number: 973-394-4460	Facsimile number, if any: 973-394-4635		
This is (check one):			
one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
other.			
other.			
Briefly describe the books and records kept at INFORMATION RELATED TO WRAP FEE AND MA		1S INCLUDING PARTICIPA	NT DATA, POSITION DATA, AND TRADING DATA.
Name of entity where books and records are ke TD ASSET MANAGEMENT	ept:		
Number and Street 1: 161 BAY STREET		Number and Street 2: 35TH FLOOR	
City:	State:	Country:	ZIP+4/Postal Code:

If this address is a private residence, check this box: $\ \square$						
Telephone Number: Facsimile number, if any: 888-834-3857						
This is (check one): one of your branch offices or affiliates. one a third-party unaffiliated recordkeeper. other. Briefly describe the books and records kept at this TRADING, PORTFOLIO MANAGEMENT, PROXY VOTI		ORDS, VARIOUS JOURNALS.				
Name of entity where books and records are kept: BLOOMBERG						
Number and Street 1: 181 BAY STREET		Number and Street 2: SUITE 330				
City: TORONTO, ONTARIO	State:	Country: Canada	ZIP+4/Postal Code: M5J 2T3			
If this address is a private residence, check this bo	x: 🗆					
Telephone Number: 416-203-5788	Facsimile numbe	er, if any:				
This is (check one):						
$^{ extsf{C}}$ one of your branch offices or affiliates.						
• a third-party unaffiliated recordkeeper.						
C other.						
Briefly describe the books and records kept at this RECORDS RELATING TO CLIENT TRADING	location.					
Name of entity where books and records are kept: STARCOMPLIANCE						
Number and Street 1: 60 EAST 42ND STREET		Number and Street 2: SUITE 2340				
City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10165			
If this address is a private residence, check this bo	x: 🗆					
Telephone Number: 301-340-3900	Facsimile number, if an	y:				
This is (check one):						
O one of your branch offices or affiliates.						
 a third-party unaffiliated recordkeeper. 						
C other.						
Briefly describe the books and records kept at this EMPLOYEE RECORDS FOR CODE OF ETHICS AND P						

Name of entity where books and records are kep PERSHING LLC	ot:		
Number and Street 1: ONE PERSHING PLAZA		Number and Street 2:	
City: JERSEY CITY	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07399
If this address is a private residence, check this	box:		
Telephone Number: 201-413-2000	Facsimile number, if any:		
This is (check one):			
one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at the CUSTODIAN RECORDS	nis location.		
Name of entity where books and records are kep TD BANK N.A.	ot:		
Number and Street 1: 1006 ASTORIA BLVD		Number and Street 2:	
City: CHERRY HILL	State: New Jersey	Country: United States	ZIP+4/Postal Code: 08034
If this address is a private residence, check this	box:		
Telephone Number: 856-685-5148	Facsimile number, if any:		
This is (check one):			
• one of your branch offices or affiliates.			
C a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at the CUSTODIAN RECORDS, VARIOUS REPORT.	nis location.		
Name of entity where books and records are kep TD ASSET MANAGEMENT	ot:		
Number and Street 1: 79 WELLINGTON STREET WEST		Number and Street 2: 8TH FLOOR, TD TOWER	
City: TORONTO, ONTARIO	State:	Country: Canada	ZIP+4/Postal Code: M5K 1A2
If this address is a private residence, check this	box:		
Telephone Number: 416-982-3457	Facsimile numb	er, if any:	
This is (check one):			
• one of your branch offices or affiliates.			

O a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept a COMPLIANCE RECORDS	t this location.			
Name of entity where books and records are IRON MOUNTAIN	kept:			
Number and Street 1:		Number and Street	2.	
195 SUMMERLEA ROAD		Number and Street	2.	
City: BRAMPTON, ONTARIO	State:	Country: Canada	ZIP+4/Postal Code: L6T4P6	
If this address is a private residence, check the	nis box:			
Telephone Number: 800-327-8345	Facsimile nu	ımber, if any:		
This is (check one):				
one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept a BOOKS AND RECORDS NO LONGER REQUIRE		SITE.		
Name of entity where books and records are INSTITUTIONAL SHAREHOLDER SERVICES	kept:			
Number and Street 1: 1 CHASE MANHATTAN PLAZA		Number and Street 2:		
City:	State:	Country:	ZIP+4/Postal Code:	
NEW YORK	New York	United States	10005	
If this address is a private residence, check the	nis box:			
Telephone Number: 6467784190	Facsimile number, if	any:		
This is (check one):				
$oldsymbol{\mathbb{C}}$ one of your branch offices or affiliates.				
a third-party unaffiliated recordkeeper.				
C other.				
Briefly describe the books and records kept a RECORDS RELATED TO PROXY VOTING.	t this location.			
Name of entity where books and records are STATE STREET BANK AND TRUST	kept:			
Number and Street 1: ONE LINCOLN STREET		Number and S	Street 2:	
City: BOSTON	State: Massachusetts	Country: United States	ZIP+4/Postal Code: 02111	
If this address is a private residence, check the	nis box:			

Telephone Number:	Facsimile number, if any:						
This is (check one):							
O one of your branch offices or affiliates.							
a third-party unaffiliated recordkeeper.	⊙ a third-party unaffiliated recordkeeper.						
C other.							
Briefly describe the books and records kept at the STATE STREET SERVES AS ADMINISTRATOR TO RECORDS AND INVESTOR FILES FOR THESE PRI	SEVERAL PRIVATE INVEST		AGED BY EPOCH. STATE STREET MAINTAINS AC	COUNTING			
Name of entity where books and records are kep COMPLIANCE SCIENCE, INC.	ot:						
Number and Street 1: 136 MADISON AVENUE		Number and Street 2	:				
City:	State:	Country:	ZIP+4/Postal Code:				
NEW YORK	New York	United States	10016				
If this address is a private residence, check this	box: 🗆						
Telephone Number: 212-327-1533	Facsimile number, if an	y:					
This is (check one):							
$\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ $							
a third-party unaffiliated recordkeeper.							
O other.							
Briefly describe the books and records kept at the EMPLOYEE RECORDS FOR CODE OF ETHICS AND							
Name of entity where books and records are kep STATE STREET FUND SERVICES IRELAND LIMITI							
Number and Street 1: 78 SIR JOHN ROGERSON'S QUAY		Number and	Street 2:				
City:	State:	Country:	ZIP+4/Postal Code:				
DUBLIN		Ireland					
If this address is a private residence, check this	box: 🗆						
Telephone Number: 353 1 776 4172	Facsimile nu	umber, if any:					
This is (check one):							
one of your branch offices or affiliates.							
a third-party unaffiliated recordkeeper.							
C other.							
Briefly describe the books and records kept at the TRANSFER AGENT AND CUSTODIAN OF UCIT FU							
Name of entity where books and records are kep	ot:						

CHARLES RIVER INVESTMENT MANAGEMENT SOLUTION

Number and Street 1: 700 DISTRICT AVENUE		Number and Street 2:						
City:	State:	Country:	ZIP+4/Postal Code:					
BURLINGTON	Massachusetts	United States	01803					
If this address is a private residence, check th	is box:							
Telephone Number: 1 781 238 0099	Facsimile number, if any:							
This is (check one):								
,	$oldsymbol{\mathbb{C}}$ one of your branch offices or affiliates.							
• a third-party unaffiliated recordkeeper.								
O other.								
Briefly describe the books and records kept at RECORDS RELATING TO CLIENT TRADING	this location.							
Name of entity where books and records are k SS&C ADVENT	ept:							
Number and Street 1: 4 TIMES SQUARE		Number and Street 2:						
City:	State:	Country:	ZIP+4/Postal Code:					
NEW YORK	New York	United States	10036					
If this address is a private residence, check th	is box:							
Telephone Number: 212 298 1188	Facsimile number, if an	y:						
This is (check one):								
O one of your branch offices or affiliates.								
• a third-party unaffiliated recordkeeper.								
C other.								
Briefly describe the books and records kept at RECORDS RELATING TO PORTFOLIO ACCOUNT		CONCILIATIONS						
Name of entity where books and records are k SEI TRUST COMPANY	ept:							
Number and Street 1: 1 FREEDOM VALLEY DRIVE		Number and Street 2: PO BOX 1100						
City:	State:	Country:	ZIP+4/Postal Code:					
OAKS	Pennsylvania	United States	19456					
If this address is a private residence, check th	is box:							
Telephone Number: 610-676-1000	Facsimile number, if any	<i>/</i> :						
This is (check one):								
O one of your branch offices or affiliates.								
 a third-party unaffiliated recordkeeper. 								
O other.								

Briefly describe the books and records kept at this lose trust company is the trustee of the epocaccounting records and investor files for	CH INVESTMENT PART		TRUST. SEI TRUST COMPANY MAINTAINS
Name of entity where books and records are kept: THE BANK OF NEW YORK MELLON			
Number and Street 1: 225 LIBERTY STREET		Number and Street 2:	
	State: New York	Country: United States	ZIP+4/Postal Code: 10286
If this address is a private residence, check this box	: □		
Telephone Number: I 212-635-6314	Facsimile number, if ar	ny:	
This is (check one):			
one of your branch offices or affiliates.			
• a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this locustodian RECORDS.	ocation.		
Name of entity where books and records are kept: GLOBAL RELAY COMMUNICATIONS INC.			
Number and Street 1: 286 MADISON AVENUE		Number and Street 2: 7TH FLOOR	
,	State:	Country:	ZIP+4/Postal Code:
NEW YORK	New York	United States	10017
If this address is a private residence, check this box	:		
	Facsimile number, if an	ny:	
866-484-6630			
This is (check one):			
O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
C other.			
Briefly describe the books and records kept at this leader the ELECTRONIC CORRESPONDENCE ARCHIVING	ocation.		
Name of entity where books and records are kept: COMMONWEALTH SHAREHOLDER SERVICES, INC.			
Number and Street 1: 8730 STONY POINT PARKWAY		Number and Street 2: SUITE 205	
City:	State:	Country:	ZIP+4/Postal Code:
RICHMOND	Virginia	United States	23235
If this address is a private residence, check this box	:		
Telephone Number: 804-267-7400	Facsimile number, if	fany:	

This is (check one):								
one of your branch offices or affiliates.								
• a third-party unaffiliated recordkeeper.								
C other.								
Briefly describe the books and records kept at this location. COMMONWEALTH SERVES AS ADMINISTRATOR OF A PRIVATE INVESTMENT VEHICLE MANAGED BY EPOCH. COMMONWEALTH MAINTAINS ACCOUNTING RECORDS AND INVESTOR FILES FOR THE PRIVATE INVESTMENT VEHICLE.								
Name of entity where books and records are kep IRON MOUNTAIN	pt:							
Number and Street 1: 100 HARBOR DRIVE		Number and Street 2:						
City:	State:	Country:	ZIP+4/Postal Code:					
JERSEY CITY	New Jersey	United States	07305					
If this address is a private residence, check this	box:							
Telephone Number: 845-338-2993	Facsimile number, if any	<i>γ</i> :						
This is (check one):								
one of your branch offices or affiliates.								
a third-party unaffiliated recordkeeper.								
O other.								
Briefly describe the books and records kept at the BOOKS AND RECORDS NO LONGER REQUIRED		ITE.						
Name of entity where books and records are kep SMARSH	ot:							
Number and Street 1: 110 WILLIAM STREET		Number and Street 2: SUITE 1804						
City:	State:	Country:	ZIP+4/Postal Code:					
NEW YORK	New York	United States	10038					
If this address is a private residence, check this	box: 🗆							
Telephone Number: 1-866-762-7741	Facsimile number, if a	ny:						
This is (check one):								
one of your branch offices or affiliates.								
a third-party unaffiliated recordkeeper.								
O other.								
Briefly describe the books and records kept at the ELECTRONIC CORRESPONDENCE ARCHIVING	nis location.							
Name of entity where books and records are kep TORONTO-DOMINON BANK	ot:							
Number and Street 1: 66 WELLINGTON STREET WEST		Number and Street 2:						

City: TORONTO	State:	Country: Canada	ZIP+4/Postal Code: M5K1A2
If this address is a private residence, check this box: $\ \square$			
Telephone Number: 416-944-6367	Facsimile number,	if any:	
This is (check one):			
• one of your branch offices or affiliates.			
C a third-party unaffiliated recordkeeper.			
C other.			
Briefly describe the books and records kept at this location. CUSTODIAN RECORDS			
SECTION 1.M. Registration with Foreign Financial Regu	latory Authorities		
List the name and country, in English, of each foreign finance D Section 1.M. for each foreign financial regulatory authorit			egistered. You must complete a separate Schedule
Name of Country/Foreign Financial Regulatory Authority:			
Australia - Australian Securities and Investments Commission	on		
Other:			
Name of Country/Foreign Financial Regulatory Authority: Ireland - Central Bank of Ireland			
Other:			
Name of Country/Foreign Financial Regulatory Authority: South Africa - Financial Services Board			
Other:			

SEC	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.									
	A. 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 <i>annual updating amendment</i> to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to each of these items. You (the adviser):									
	V	(1)	are a large advisory firm	that either:						
			(a) has regulatory assets un	nder management of \$100 million (in U	J.S. dollars) or more; or					
			(b) has regulatory assets un amendment and is regis	nder management of \$90 million (in U. stered with the SEC;	S. dollars) or more at the time of filing	g its most recent annual updating				
		(2)	are a mid-sized advisory million (in U.S. dollars) and	firm that has regulatory assets under you are either:	management of \$25 million (in U.S. do	ollars) or more but less than \$100				
			(a) not required to be regis place of business; or	tered as an adviser with the <i>state secu</i>	urities authority of the state where you	maintain your <i>principal office and</i>				
			(b) not subject to examinat	ion by the state securities authority of	the state where you maintain your pri	ncipal office and place of business;				
			Click HERE for a list of a authority.	states in which an investment adviser,	if registered, would not be subject to	examination by the state securities				
		(3)	Reserved							
		(4)	have your principal office ar	nd place of business outside the Unite	ed States;					
	V	(5)	are an investment advise	r (or subadviser) to an investment	company registered under the Inves	tment Company Act of 1940;				
		(6)		r to a company which has elected to 1940 and has not withdrawn the elect	•	• • •				
		(7)	are a pension consultant exemption in rule 203A-2(a	with respect to assets of plans having a);	an aggregate value of at least \$200,00	00,000 that qualifies for the				
		are a related adviser under rule 203A-2(b) that <i>controls</i> , is <i>controlled</i> by, or is under common <i>control</i> with, an investment adviser that is registered with the SEC, and your <i>principal office and place of business</i> is the same as the registered adviser;								
			If you check this box, comp	lete Section 2.A.(8) of Schedule D.						
		(9)	are an adviser relying on re	ule 203A-2(c) because you expect to l	be eligible for SEC registration wit	hin 120 days;				
			If you check this box, comp	lete Section 2.A.(9) of Schedule D.						
		(10)	are a multi-state adviser	that is required to register in 15 or mo	re states and is relying on rule 203A-2	2(d);				
			If you check this box, comp	lete Section 2.A.(10) of Schedule D.						
		(11)	are an Internet adviser re	lying on rule 203A-2(e);						
			If you check this box, comp	lete Section 2.A.(11) of Schedule D.						
		(12)	have received an SEC ord	er exempting you from the prohibition	against registration with the SEC;					
			If you check this box, comp	lete Section 2.A.(12) of Schedule D.						
		(13)	are no longer eligible to re	emain registered with the SEC.						
Stat	e Se	curit	ties Authority Notice Filing	as and State Reporting by Exempt I	Reportina Advisers					
C. Under state laws, SEC-registered advisers may be required to provide to state securities authorities a copy of the Form ADV and any amendments they file with the SEC. These are called notice filings. In addition, exempt reporting advisers may be required to provide state securities authorities with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your notice filings or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to your registration to stop your notice filings or reports from going to state(s) that currently receive them, uncheck the box(es) next to those state(s).										
		isdict AL	ions	☑ IL	☑ NE	☑ sc				
		AL		☑ IN	I NV I SD					
		ΑZ		☑ IA	☑ NH	☑ TN				
		AR		☑ KS	☑ NJ	☑ TX				
	V	CA		☑ KY	☑ NM	☑ UT				

Item 2 SEC Registration/Reporting

☑ co	∥ 🗹 LA	∥ ☑ NY	☑ ∨T
☑ CT	₩E	 ▼ NC	□ VI
	' '=	''-	
☑ DE	☑ MD	☑ ND	☑ VA
☑ DC	☑ MA	Г ОН	₩ WA
☑ FL	⊠ MI	☑ OK	☑ w∨
☑ GA	☑ MN	☑ OR	☑ wɪ
□ GU	⊠ MS	₽ PA	₩Y
			W 1
☑ HI	☑ мо	∏ PR	
☑ ID	☑ MT	☑ RI	
,	filing fee for the coming year, your	s from going to a state that currently re amendment must be filed before the en	nd of the year (December 31).
control with an investment adviser that is adviser, provide the following information: Name of Registered Investment Adviser CRD Number of Registered Investment Ad	registered with the SEC and your <i>pr</i>		
SEC Number of Registered Investment Adv			
			,
SECTION 2.A.(9) Investment Adviser E			
If you are relying on rule 203A-2(c), the e	·	_	
within 120 days, you are required to make			king the appropriate boxes, you will be
deemed to have made the required repres		•	
☐ I am not registered or required to be re register with the SEC within 120 days a	after the date my registration with th	ne SEC becomes effective.	
☐ I undertake to withdraw from SEC regis 203A(a) of the Advisers Act from regist		y registration with the SEC becomes eff	ective, I would be prohibited by Section
SECTION 2.A.(10) Multi-State Adviser			
If you are relying on rule 203A-2(d), the n	oulti-state adviser exemption from t	he prohibition on registration, you are r	equired to make certain representations
about your eligibility for SEC registration.	•	• • • • • • • • • • • • • • • • • • • •	·
If you are applying for registration as an ir	nvestment adviser with the SEC, you	ı must make both of these representati	ons:
\square I have reviewed the applicable state an	nd federal laws and have concluded f	that I am required by the laws of 15 or	more states to register as an
investment adviser with the state secur			
$\ \square$ I undertake to withdraw from SEC registates to register as an investment adv			e required by the laws of fewer than 15
If you are submitting your annual updating	g amendment, you must make this r	representation:	
☐ Within 90 days prior to the date of filin the laws of at least 15 states to registe	•	the applicable state and federal laws as state securities authorities in those sta	
SECTION 2.A.(11) Internet Adviser			
If you are relying on rule 203A-2(e), the I	nternet adviser exemption from the	prohibition on registration, you are reg	uired to make a representation about
your eligibility for SEC registration. By che			-
If you are applying for registration as an ir		hanging your existing Item 2 response	regarding your eligibility for SEC
registration, you must make this represent	tation:		
	tation:		
registration, you must make this represent	tation: I ongoing basis to more than one clie Iment to your existing registration a	ent exclusively through an <i>operational i</i>	nteractive website.
registration, you must make this represent \square I will provide investment advice on an If you are filing an annual updating amend	tation: nongoing basis to more than one clied dment to your existing registration a tation:	ent exclusively through an <i>operational i</i> nd are continuing to rely on the Interne	nteractive website. et adviser exemption for SEC

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 <i>order</i> :

A.	How are you organized?
	© Corporation
	O Sole Proprietorship
	C Limited Liability Partnership (LLP)
	C Partnership
	C Limited Liability Company (LLC)
	C Limited Partnership (LP)
	Other (specify):
	If you are changing your response to this Item, see Part 1A Instruction 4.
В.	In what month does your fiscal year end each year? OCTOBER
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 filing an *umbrella registration*, the information in Item 3 should be provided for the *filing adviser* only.

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

Item 3 Form of Organization

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)? 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.

1//

- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
 - (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*?
 - (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?
 - (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
 - (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? 59%
- 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 *clients*. 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 Client	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	0		\$ 0
(b) High net worth individuals	664		\$ 1,943,262,635
(c) Banking or thrift institutions	1	P	\$ 2,495,087,311
(d) Investment companies	8		\$ 5,271,402,654

(e) Business development companies	0		\$ 0
(f) Pooled investment vehicles (other than investment companies and business development companies)	36	Ι Γ	\$ 18,110,325,309
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	10		\$ 2,053,563,196
(h) Charitable organizations			\$
(i) State or municipal government entities (including government pension plans)	3	Ø	\$ 1,115,070,000
(j) Other investment advisers	2	V	\$ 1,464,459,456
(k) Insurance companies	5		\$ 124,476,009
(I) Sovereign wealth funds and foreign official institutions	0		\$ 0
(m) Corporations or other businesses not listed above	12		\$ 475,747,918
(n) Other:	0		\$ 0

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

tem !	5]	[n	formatior	ı Abou	t١	our A	۱d۷	isory	Bus	iness	- F	Regul	la	tory /	\sse	ts I	Une	der l	Manageme	nt
-------	-----	----	-----------	--------	----	-------	-----	-------	-----	-------	-----	-------	----	--------	------	------	-----	-------	----------	----

Regulatory Assets Under Management

Yes No

- 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?

Total Number of Accounts

 Discretionary:
 (a) \$33,053,394,488
 (d) 774

 Non-Discretionary:
 (b) \$0
 (e) 0

 Total:
 (c) \$33,053,394,488
 (f) 774

U.S. Dollar Amount

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*?

\$ 19,634,168,658

Item 5 Information About Your Advisory Business - Advisory Activities

Advisory Activities

G.	What type(s)	of advisory	services do	vou provide?	Check all that apply.
٠.	Williac cypc(3)	or davisor,	SCI VICCS GO	you provide.	Circuit an criac appriy.

(1) Financial planning services

(2) Portfolio management for individuals and/or small businesses

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)

 \Box (6) Pension consulting services

(7) Selection of other advisers (including *private fund* managers)

[(8) Publication of periodicals or newsletters

 \square (9) Security ratings or pricing services

☐ (10) Market timing services

☐ (11) Educational seminars/workshops

(12) Other(specify): CASH MANAGEMENT, INVESTMENT ADVICE TO POOLED INVESTMENT VEHICLES, & MODEL PORTFOLIOS TO OTHER ADVISERS

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.

н.	If you provide financial planning services, to how many <i>clients</i> did you provide these services during your last fiscal year?		
	0 0		
	O 1 - 10		
	© 11 - 25 © 26 - 50		
	C 51 - 100		
	O 101 - 250		
	C 251 - 500		
	C 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	No
I.	(1) Do you participate in a wrap fee program?	⊚	\circ
	(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 \$ 0		
	(b) portfolio manager for a wrap fee program? \$ 1,823,386,248		
	(c) sponsor to and portfolio manager for the same wrap fee program? \$ 0		
	φ		
	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.I.(2) Schedule D.	of	
	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 off through a wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2).	fered	
		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	⊚
K.	Separately Managed Account <i>Clients</i>	Yes	No
	(1) Do you have regulatory assets under management attributable to <i>clients</i> other than those listed in Item 5.D.(3)(d)-(f) (separately managed account <i>clients</i>)?	_	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 <i>clients</i> that you advise?	0	•
	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 <i>clients</i> that you advise?	0	⊙
	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?	•	0
	If yes, complete Section 5.K.(3) of Schedule D for each custodian.		
L.	Marketing Activities	V	NJ -
	(1) Do any of your <i>advertisements</i> include:	Yes	NO
	· · · · · · · · · · · · · · · · · · ·		
	(a) Performance results?	•	0

(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	0	•
(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	o	•
(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
(e) Third-party ratings?	•	О
(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</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	0	•
(3) Do any of your advertisements include hypothetical performance ?	•	c
(4) Do any of your advertisements include predecessor performance ?	0	•
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 developm 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 regist investment company and business development company to which you act as an adviser.		
SEC File Number 811 - 21777		
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.		
No Information Filed		
SEC File Number 811 - 22321		
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.		
No Information Filed		
SECTION 5.I.(2) Wrap Fee Programs		
If you are a portfolio manager for one or more <i>wrap fee programs</i> , list the name of each program and its <i>sponsor</i> . You must complete a separate Sch Section 5.I.(2) for each <i>wrap fee program</i> for which you are a portfolio manager.	iedule	e D
Name of Wrap Fee Program ADHESION WEALTH ADVISORS		
Name of <i>Sponsor</i> ADHESION WEALTH ADVISORS		
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):		
Sponsor's CRD Number (if anv):		

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Name of Wrap Fee Program
ADVISORY SOLUTIONS UNIFIED MANAGED ACCOUNT PROGRAM
Name of Sponsor
EDWARD JONES & CO., L.P.
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
ENVESTNET GENERAL DISTRIBUTION
Name of Sponsor
ENVESTNET
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
FREEDOM UNIFIED MANAGED ACCOUNT (UMA), RAYMOND JAMES CONSULTING SERVICES
Name of Sponsor
RAYMOND JAMES
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
IAS UMA
Name of Sponsor
OPPENHEIMER ASSET MANAGEMENT, INC.
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
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MANAGED ACCOUNT PROGRAM

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Name of Sponsor
SAWTOOTH SOLUTIONS, LLC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
MANAGER SELECT, MANAGER ACCESS SELECT
Name of Sponsor
LPL FINANCIAL, LLC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
MERRILL LYNCH INVESTMENT ADVISORY PROGRAM (IAP), US TRUST SPS
Name of Sponsor
MERRILL LYNCH
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
MSSB SELECT UMA
Name of Sponsor
MORGAN STANLEY
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
ORION PORTFOLIO SOLUTIONS, LLC
Name of Sponsor
ORION PORTFOLIO SOLUTIONS, LLC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
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Name of Wrap Fee Program
PNC BANK UMA
Name of Sponsor
PNC BANK UMA
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
SMARTX ADVISORY SOLUTIONS LLC
Name of Sponsor
SMARTX ADVISORY SOLUTIONS LLC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
TD GUIDED PORTFOLIO NON-DISCRETIONARY PROGRAM
Name of Sponsor
TD PRIVATE CLIENT WEALTH LLC |ENVESTNET|PMC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
TD GUIDED PORTFOLIOS PROGRAM
Name of Sponsor
TD PRIVATE CLIENT WEALTH LLC |ENVESTNET|PMC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
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TD PREMIER GUIDED PORTFOLIOS PROGRAM

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Name of Sponsor
TD PRIVATE CLIENT WEALTH LLC |ENVESTNET|PMC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
TD WATERHOUSE PRIVATE INVESTMENT ADVICE
Name of Sponsor
TD WATERHOUSE PRIVATE INVESTMENT ADVICE
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
TD WATERHOUSE PRIVATE INVESTMENT COUNSEL INC.
Name of Sponsor
TD WATERHOUSE PRIVATE INVESTMENT COUNSEL INC.
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
UNIFIED PORTFOLIO
Name of Sponsor
RBC WEALTH MANAGEMENT
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
Name of Wrap Fee Program
WILLIAM BLAIR LLC
Name of Sponsor
SYSTM WEALTH SOLUTIONS LLC,
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
Sponsor's CRD Number (if any):
```

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.

Asset Type	Mid-year	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	%	%
(viii) 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"

Asse	et Type	End of year
(i)	Exchange-Traded Equity Securities	83 %
(ii)	Non Exchange-Traded Equity Securities	0 %
(iii)	U.S. Government/Agency Bonds	12 %
(iv)	U.S. State and Local Bonds	0 %
(v)	Sovereign Bonds	0 %
(vi)	Investment Grade Corporate Bonds	5 %
(vii)	Non-Investment Grade Corporate Bonds	0 %
(viii)	Derivatives	0 %
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	0 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	0 %
(xi)	Cash and Cash Equivalents	0 %
(xii)	Other	0 %

Generally describe any assets included in "Other"

☑ 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)) Derivative E	xposures		
			(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		(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.

SEC	TION 5.K.(3) Custodians for Separa	tely Managed Accounts		
	nplete a separate Schedule D Section 5 ulatory assets under management.	5.K.(3) for each custodian that holds ten p	percent or more of your aggregate separately m	lanaged account
(a)	Legal name of custodian:			
	THE BANK OF NEW YORK MELLON			
(b)	Primary business name of custodian:			
	THE BANK OF NEW YORK MELLON			
(c)	The location(s) of the custodian's offi	ce(s) responsible for <i>custody</i> of the asset	:s :	
	City:	State:	Country:	
	NEW YORK	New York	United States	
				Yes No
(d)	Is the custodian a related person of y	our firm?		0 0
(e)	If the custodian is a broker-dealer, pr	ovide its SEC registration number (if any)	
	-			
(f)	If the custodian is not a broker-deale HPFHU0OQ28E4N0NFVK49	r, or is a broker-dealer but does not have	e an SEC registration number, provide its <i>legal e</i> .	ntity identifier (if any)
(g)	What amount of your regulatory asses \$ 3,853,946,564	ts under management attributable to sep	parately managed accounts is held at the custod	lian?
(a)	Legal name of custodian: CIBC MELLON			
(b)	Primary business name of custodian:			
	CIBC MELLON			
(c)	The location(s) of the custodian's office	ce(s) responsible for <i>custody</i> of the assets	5:	
	City:	State:	Country:	
	TORONTO		Canada	
				Yes No
(d)	Is the custodian a related person of y	our firm?		0 0
(e)	If the custodian is a broker-dealer, pro	ovide its SEC registration number (if any)	ı	
	-			
(f)	If the custodian is not a broker-dealer	, or is a broker-dealer but does not have	an SEC registration number, provide its <i>legal er</i>	ntity identifier (if any)
(g)	What amount of your regulatory asset	ts under management attributable to sep	arately managed accounts is held at the custodi	an?
	\$ 13,452,242,738			
(a)	Legal name of custodian:			
	STATE STREET			
(b)	Primary business name of custodian:			
	STATE STREET			

(c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :

	City: BOSTON	State: Massachusetts	Country: United States	V	N -
(d)	Is the custodian a <i>related person</i> of	your firm?		Yes	No
(e)	If the custodian is a broker-dealer, p	rovide its SEC registration number (if any)			
` '		•	stration number, provide its legal entity identifier (if a	ny)	
(g)	What amount of your regulatory asso \$ 4,521,765,481	ets under management attributable to separately man	aged accounts is held at the custodian?		
(a)	Legal name of custodian:				
	JP MORGAN				
(b)	Primary business name of custodian:				
	JP MORGAN				
(c)	The location(s) of the custodian's off	ice(s) responsible for <i>custody</i> of the assets :			
	City:	State:	Country:		
	NEW YORK	New York	United States		
			,	Yes	No
(d)	Is the custodian a <i>related person</i> of	your firm?		0	•
(e)	If the custodian is a broker-dealer, p	rovide its SEC registration number (if any)			
(f)	If the custodian is not a broker-deale	er, or is a broker-dealer but does not have an SEC regi	stration number, provide its <i>legal entity identifier</i> (if a	ny)	
(g)	What amount of your regulatory asso \$ 5,627,000,789	ets under management attributable to separately man	aged accounts is held at the custodian?		

Ite	n 6 0	ther Business Activities	
In t	his Ite	m, we request information about your firm's other business activities.	
Α.	You	are actively engaged in business as a (check all that apply): (1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (4) futures commission merchant (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or division of a bank) (8) trust company (9) registered municipal advisor (10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salesperson (specify):	
	If yo	u 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
В.	(1)	Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?	⊚
	(2)	If yes, is this other business your primary business?	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 name.	
		Yes	No
	(3)	Do you sell products or provide services other than investment advice to your advisory <i>clients</i> ?	•
		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.	
SEC	TION	6.A. Names of Your Other Businesses	
		No Information Filed	
SEC	TION	6.B.(2) Description of Primary Business	
		your primary business (not your investment advisory business):	
If y	ou en	gage in that business under a different name, provide that name:	
SEC	TION	6.B.(3) Description of Other Products and Services	
		other products or services you sell to your <i>client</i> . You may omit products and services that you listed in Section 6.B.(2) above.	
If y	ou en	gage 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*.

СС	ur between	you and your <i>clients</i> .
Α.	-	of Item 7 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates. Your <i>related persons</i> are all of sory affiliates and any <i>person</i> that is under common <i>control</i> with you.
	You have	a <i>related person</i> that is a (check all that apply):
	▽ (1)	broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered) other investment adviser (including financial planners)
	☐ (3)	registered municipal advisor
	<u> </u>	registered security-based swap dealer
	<u> </u>	major security-based swap participant
	(6)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
	□ (7) ☑ (8)	futures commission merchant banking or thrift institution
	☑ (8)	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), excluding pooled investment vehicles
	☑ (16)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles
	represen	Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered tatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).
		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 Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.
	For each of Sched	related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. ule D.
	connection clients or persons of	ot 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 on with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a finterest with your clients.
	your cliei	complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to this (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related be operationally independent under rule 206(4)-2 of the Advisers Act.
EC	TION 7.A.	Financial Industry Affiliations
Cor	nplete a se	parate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.
1.		e of <i>Related Person</i> : ITIES (JAPAN) CO., LTD.
2.		usiness Name of <i>Related Person</i> : ITIES (JAPAN) CO., LTD.
3.	Related Pe	erson's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)
	or Other	
4.	Related Pe (a) CRD	erson's Number (if any):
	(b) CIK	Number(s) (if any):
	(b) CIN	No Information Filed
5.		erson is: (check all that apply)
		broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)

	(८)	☐ 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		
	(1)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(0)	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	s No
6.	Do y	ou control or are you controlled by the related person?	0	\odot
7.	Are y	you and the related person under common control?	0	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> ?	0	•
		If you are registering or registered with the SEC and you have answered "yes," to guestion 8.(a) above, have you overcome the		
	(D)	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	0	0
		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>clier</i>	tc'	
	(C)	assets:	11.5	
		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:		
			Yes	s 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?	•	
	(0)	if the answer is yes, under what exemption:		
10	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	_
10.	(u)	is the related person registered with a foreign maneral regulatory duthorty :	⊚	- 0
	(h)	If the answer is yes, list the name and country in English of each foreign financial regulatory authority with which the related person is re-	aictor	od
	(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 replaced to the country of the same of Country of the cou	gister	ed.
	(b)	Name of Country/English Name of Foreign Financial Regulatory Authority	gister	ed.
		Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION	gister	ed.
11.		Name of Country/English Name of Foreign Financial Regulatory Authority		ed.
	Do y	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons?		
	Do y	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION		
	Do y	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons?	0	0
	Do y	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons?	0	0
12.	Do y	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location?	0	0
12.	Do y Do y	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person:	0	0
12.	Do y Do y	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location?	0	0
12.	Do y Do y Lega TD B	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH	0	0
12.	Do y Do y Lega TD B	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person:	0	0
12.	Do y Do y Lega TD B	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH	0	0
1.	Do y Do y Lega TD B Prim TD B	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: BANK HONG KONG BRANCH ary Business Name of Related Person: BANK HONG KONG BRANCH	0	0
1.	Do y Do y Lega TD B Prim TD B	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person:	0	0
1.	Do y Lega TD B Prim TD B Relati	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: BANK HONG KONG BRANCH ary Business Name of Related Person: BANK HONG KONG BRANCH	0	0
1.	Do y Lega TD B Prim TD B Relati - or	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person: ANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	0	0
1.	Do y Lega TD B Prim TD B Relati	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person: ANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati - or Othe	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: IANK HONG KONG BRANCH ary Business Name of Related Person: IANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati - or Othe	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: IANK HONG KONG BRANCH ary Business Name of Related Person: IANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati - or Othe	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: IANK HONG KONG BRANCH ary Business Name of Related Person: IANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati - or Othe	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person: ANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or ted Person's CRD Number (if any):	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati or Othee	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: IANK HONG KONG BRANCH ary Business Name of Related Person: IANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati or Othee	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person: ANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or ted Person's CRD Number (if any): CIK Number(s) (if any):	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati or Othee	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person: ANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or ted Person's CRD Number (if any): CIK Number(s) (if any):	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati or Othee Relati (a)	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person: ANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or ted Person's CRD Number (if any): CIK Number(s) (if any):	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati or Othee Relati (a)	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person: IANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or ted Person's CRD Number (if any): No Information Filed	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relati or Othee Relati (a) (b)	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person: ANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or ted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer	0	0
1. 2. 3.	Do y Lega TD B Prim TD B Relai or Othee Relai (a) (b)	Name of Country/English Name of Foreign Financial Regulatory Authority Other - JAPAN SECURITIES DEALERS ASSOCIATION ou and the related person share any supervised persons? ou and the related person share the same physical location? I Name of Related Person: ANK HONG KONG BRANCH ary Business Name of Related Person: ANK HONG KONG BRANCH ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) or ted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer	0	0

	(e)			
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)			
	(h)			
	(i)	☐ trust company ☐ accountant or accounting firm		
	(j) (k)			
	(N) (I)	insurance company or agency		
	(m)			
	(n)			
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	\square sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	0	⊚
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	⊙	\circ
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> ?	\circ	⊚
	(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> ?	0	О
	(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 client	ts'	
		assets:		
		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:		
			Yes	No
9.	(a)	If the <i>related person</i> 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
	(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 reg	istere	ed.
	. ,			
	. ,	Name of Country/English Name of Foreign Financial Regulatory Authority		
	_	Other - HONG KONG MONETARY AUTHORITY		
11.	Do y		•	0
		Other - HONG KONG MONETARY AUTHORITY		
		Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons?		0
		Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons?		0
12.	Do y	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person:		0
12.	Do y	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location?		0
12.	Do y	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION		0
12.	Do y Lega TD E	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person:		0
12.	Do y Lega TD E	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person:		0
1.	Do y Lega TD E	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person:		0
1.	Do y Lega TD E Prim TD E	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA		0
1.	Lega TD E Prim TD E Rela	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		0
1.	Do y Lega TD E Prim TD E	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Other	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Othe	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Othe	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA seted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er seted Person's		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Othe	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA atted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er sted Person's CRD Number (if any): CIK Number(s) (if any):		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Othe Rela (a)	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er sted Person's CRD Number (if any):		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Othe Rela (a)	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA atted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er sted Person's CRD Number (if any): CIK Number(s) (if any):		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Other Rela (a)	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? all Name of Related Person: BANK, NATIONAL ASSOCIATION harry Business Name of Related Person: BANK NA sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er sted Person's CRD Number (if any): No Information Filed		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Other Rela (a)	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION harry Business Name of Related Person: BANK NA sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er sted Person's CRD Number (if any): No Information Filed		0
1. 2. 3.	Do y Legar TD E Prim TD E Rela or Other (a) (b)	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA sted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er sted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed sted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Other (b)	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION hary Business Name of Related Person: BANK NA sited Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er sted Person's CRD Number (if any): CIK Number(s) (if any): No Information Filed broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Other (a) (b) Rela (a) (b) (c)	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION harry Business Name of Related Person: BANK NA steed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er the Person's CRD Number (if any): No Information Filed broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor		0
1. 2. 3.	Do y Lega TD E Prim TD E Rela - or Other (a) (b) Rela (a) (b) (c)	Other - HONG KONG MONETARY AUTHORITY you and the related person share any supervised persons? you and the related person share the same physical location? al Name of Related Person: BANK, NATIONAL ASSOCIATION harry Business Name of Related Person: BANK NA steed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) er the Person's CRD Number (if any): No Information Filed broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor		0

	(g)	L futures commission merchant		
	(h)	▶ banking or thrift institution		
	(i)	□ trust company		
	(j)	accountant or accounting firm		
	(k)	_		
	(I)	insurance company or agency		
	(m)			
	(n)	_		
	` '	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	. ,	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(F)		Yes	s No
6.	Do v	ou control or are you controlled by the related person?	0	
	,		- 0	⊚
7	Are v	you and the related person under common control?	_	_
	, 0	you and the rotated person under common control	⊚	О
Ω	(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> ?	_	_
0.	. ,		⊚	
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	⊙	0
		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)		'antal	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>cla</i> assets:	ents.	
		Number and Street 1: Number and Street 2:		
		1006 ASTORIA BOULEVARD		
		City: State: Country: ZIP+4/Postal Code:		
		CHERRY HILL New Jersey United States 08034		
		If this address is a private residence, check this box:		
			Ye	s No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		
	(-)			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	0	•
	(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		
	(5)	No Information Filed	egioto.	-
	_			
11.	ро у	ou and the <i>related person</i> share any <i>supervised persons</i> ?	6	0
11.	ро у	ou and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
		ou and the <i>related person</i> share any <i>supervised persons</i> ? ou and the <i>related person</i> share the same physical location?		o ⊚
12.	Do y			
12.	Do y	ou and the <i>related person</i> share the same physical location?		
12.	Do y	ou and the <i>related person</i> share the same physical location? Il Name of <i>Related Person</i> :		
12.	Do y Lega TD S	ou and the <i>related person</i> share the same physical location? Il Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC ary Business Name of <i>Related Person</i> :		
12.	Do y Lega TD S	ou and the <i>related person</i> share the same physical location? Il Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC		
1.	Lega TD S Prim TD S	ou and the <i>related person</i> share the same physical location? Il Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC ary Business Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC		
1.	Lega TD S Prim TD S	ou and the <i>related person</i> share the same physical location? If Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC ary Business Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
1.	Lega TD S Prim TD S	ou and the <i>related person</i> share the same physical location? Il Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC ary Business Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC		
1.	Lega TD S Prim TD S Relaa 8 - 6	ou and the <i>related person</i> share the same physical location? Il Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC ary Business Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC ted <i>Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) S8677		
1.	Lega TD S Prim TD S Relat 8 - 6	ou and the <i>related person</i> share the same physical location? Il Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC ary Business Name of <i>Related Person</i> : SECURITIES AUTOMATED TRADING LLC ted <i>Person's</i> SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) S8677		
1. 2. 3.	Lega TD S Prim TD S Relai 8 - 6 or Othe	IN Name of Related Person: SECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18677		
1. 2. 3.	Lega TD S Prim TD S Relat 8 - 6 or Othe	ou and the related person share the same physical location? Il Name of Related Person: ECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: ECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) E8677 ted Person's		
1. 2. 3.	Lega TD S Prim TD S Relat 8 - 6 or Othe	ou and the related person share the same physical location? Il Name of Related Person: SECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) S8677 er ted Person's CRD Number (if any):		
1. 2. 3.	Lega TD S Prim TD S Relate 8 - 6 or Other Relate (a)	ou and the related person share the same physical location? Il Name of Related Person: SECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) SECORT SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any): 154838		
1. 2. 3.	Lega TD S Prim TD S Relate 8 - 6 or Other Relate (a)	ou and the related person share the same physical location? Il Name of Related Person: ECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: ECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18677 er ted Person's CRD Number (if any): 154838 CIK Number(s) (if any):		
1. 2. 3.	Lega TD S Prim TD S Relate 8 - 6 or Other Relate (a)	ou and the related person share the same physical location? Il Name of Related Person: SECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) SECORT SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any): 154838		
1. 2. 3.	Lega TD S Prim TD S Relate 8 - 6 or Other Relate (a)	ou and the related person share the same physical location? Il Name of Related Person: ECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: ECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 18677 er ted Person's CRD Number (if any): 154838 CIK Number(s) (if any):		
12. 1. 2. 3.	Lega TD S Prim TD S Relai 8 - 6 or Othe Relai (a)	ou and the related person share the same physical location? Il Name of Related Person: SECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) SECORITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any): SECORITIES AUTOMATED TRADING LLC TRADING LLC TRADING LLC No Information Filed		
12. 1. 2. 3.	Legal TD S Prim TD S Relai 8 - 6 or Other Relai (a) (b)	ou and the related person share the same physical location? Il Name of Related Person: ECCURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: ECCURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) EXECURITIES AUTOMATED TRADING LLC ted Person's CRD Number (if any): 154838 CIK Number(s) (if any): No Information Filed		
12. 1. 2. 3.	Do y Legal TD S Prim TD S Relai 8 - 6 or Othe (a) (b)	in Name of Related Person: SECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: SECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) SECT ted Person's CRD Number (if any): 154838 CIK Number(s) (if any): No Information Filed ted Person is: (check all that apply) Proker-dealer, municipal securities dealer, or government securities broker or dealer		
12. 1. 2. 3.	Do y Legal TD S Prim TD S Relate 8 - 6 or Other (a) (b) Relate (a) (b)	ou and the related person share the same physical location? Il Name of Related Person: ECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: ECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 88677 er ted Person's CRD Number (if any): 154838 CIK Number(s) (if any): No Information Filed ted Person is: (check all that apply) Torker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners)		
12. 1. 2. 3.	Do y Lega TD S Prim TD S Relate 8 - 6 or Other (a) (b) (c)	al Name of Related Person: SECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: SECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: SECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) S8677 er ted Person's CRD Number (if any): 154838 CIK Number(s) (if any): No Information Filed ted Person is: (check all that apply) Tooker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor		
12. 1. 2. 3.	Do y Lega TD S Prim TD S Relai 8 - 6 or Othe Relai (a) (b) (c) (d)	In Name of Related Person: In Name of Related Pe		
12. 1. 2. 3.	Do y Lega TD S Prim TD S Relat 8 - 6 or Other (a) (b) Relat (a) (c) (d) (e)	ou and the related person share the same physical location? If Name of Related Person: ECURITIES AUTOMATED TRADING LLC ary Business Name of Related Person: ECURITIES AUTOMATED TRADING LLC ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 86677 tet ded Person's CRD Number (if any): 154838 CIK Number(s) (if any): No Information Filed ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer or registered municipal advisor registered municipal advisor registered security-based swap dealer major security-based swap participant		
12. 1. 2. 3.	Do y Lega TD S Prim TD S Relat 8 - 6 or Other (a) (b) Relat (a) (c) (d) (e)	In Name of Related Person: In Name of Related Pe		

	(i)	□ trust company		
	(3)	accountant or accounting firm		
	. ,	lawyer or law firm		
	. ,	insurance company or agency		
	(m)			
	(n) (o)	_		
	. ,	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(P)		/es	No
6.	Do y	rou control or are you controlled by the related person?	0	•
			~	
7.	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?	o	•
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	o	0
		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's</i> office responsible for <i>custody</i> of your <i>clients</i> assets:		
		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:		
			es/	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	О	⊙
	(b)	If the answer is yes, under what exemption?		
10.		Is the related person registered with a foreign financial regulatory authority?	0	⊙
	(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 regis No Information Filed	tere	d.
11	Do v	rou and the related person share any supervised persons?	_	_
11.	υ,	ou and the related person share any supervised persons.	0	•
12.	Do y	rou and the related person share the same physical location?	0	•
			~	
1	Lagn	Name of Polated Deven		
1.		Il Name of <i>Related Person</i> : VATERHOUSE CANADA INC.		
2.	Prim	ary Business Name of Related Person:		
	TD V	VATERHOUSE CANADA INC.		
	. ,			
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Othe	er		
4.		ted Person's		
	(a)	CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
	(5)	No Information Filed		
5.		ted Person is: (check all that apply)		
	(a)			
	(b) (c)	 □ other investment adviser (including financial planners) □ registered municipal advisor 		
	. ,	registered municipal advisor registered security-based swap dealer		
	٠,	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		
1	(k)	lawyer or law firm		

	(1)	insurance company or agency		
	(m)	pension consultant		
	(n)			
	(0)			
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
_	Davi	an control or are you controlled by the related nersen?	Yes	
о.	ро у	ou control or are you controlled by the related person?	\circ	⊚
7	Aro v	you and the related person under common central?	_	_
ļ'.	AIC y	ou and the <i>related person</i> under common <i>control</i> ?	⊙	0
Q	(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> ?	_	_
0.			О	⊙
	(D)	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> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>client</i> assets:	s'	
		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	Yes	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
١٠.			0	О
	(D)	If the answer is yes, under what exemption?		
10	(a)	Is the related person registered with a foreign financial regulatory authority ?	_	_
10.	` '			O
	(D)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is region is regional regulatory. In the country/English Name of Foreign Financial Regulatory Authority	Stere	u.
		Canada - Alberta Securities Commission		\dashv
		Canada - British Columbia Securities Commission		\dashv
		Canada - Manitoba Securities Commission		-
				-
		Canada - New Brunswick Securities Commission		\dashv
		Canada - Newfoundland and Labrador, Financial Services Regulation Division		_
		Canada - Northwest Territories, Office of the Registrar of Securities		_
		Canada - Nova Scotia Securities Commission		_
		Canada - Nunavut, Registrar of Securities		_
		Canada - Ontario Securities Commission		_
		Canada - Prince Edward Island, Securities Office		
		Canada - Quebec, Financial Markets Authority		
		Canada - Saskatchewan Financial Services Commission		
		Canada - Yukon Territories, Registrar of Securities		
		Other - INVESTMENT INDUSTRY REGULATORY AUTHORITY OF CANADA (IIROC)		
11.	Do y	ou and the <i>related person</i> share any <i>supervised persons</i> ?	0	•
			~	•
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	•
1	Loga	Name of Related Person:		
1.	-	RIVATE CLIENT WEALTH LLC		
2.	Prima	ary Business Name of Related Person:		
	TD P	RIVATE CLIENT WEALTH LLC		
3.		red Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or or	- 77771		
	Othe	r		
	0			
4.	Relat	red Person's		
	(a)	CRD Number (if any):		
		164484		
	(b)	CIK Number(s) (if any):		
		No Information Filed		

	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 (l) insurance company or agency (m) pension consultant 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		
6.	Do you control or are you controlled by the related person?	Yes O	No ⊙
7.	Are you and the related person under common control?	•	0
8.	(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	0
J.	(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> ?	0	0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> assets:	· '	
	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:		
9.		Yes	_
٥.	(b) If the answer is yes, under what exemption?	0	•
10	. (a) Is the related person registered with a foreign financial regulatory authority ?	_	
10.	(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 regis No Information Filed	C stere	⊙
11.	. Do you and the related person share any supervised persons?	O	•
12.	. Do you and the <i>related person</i> share the same physical location?	•	0
1.	Legal Name of <i>Related Person</i> : EPOCH INVESTMENT PARTNERS UK, LTD		
2.	Primary Business Name of <i>Related Person</i> : EPOCH INVESTMENT PARTNERS UK, LTD		
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): No Information Filed		
	No Information Fried		
5.	Related Person is: (check all that apply) (a) Droker-dealer, municipal securities dealer, or government securities broker or dealer		

	(D)	✓ other investment adviser (including financial planners)		
	(c)			
	(d)			
	(e)			
	(f)			
	(g)	_		
	(h)			
	. ,	trust company		
	(j) (k)	accountant or accounting firm		
	. ,	☐ lawyer or law firm ☐ insurance company or agency		
	(n)			
	(n)			
	(o)	_		
	٠,	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
			Yes	No
6.	Do y	you control or are you controlled by the related person?	0	•
			~	~
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	•	
			٠	~
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> ?	0	0
		If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	- 0	•
	(5)	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	0	
		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 related person's office responsible for custody of your client	its'	
		assets:		
		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:	Voc	No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?		
۶.	. ,		•	
	(b)	If the answer is yes, under what exemption? UNITED KINGDOM.INVESTMENT ADVISER		
		ONITED KINGDOM:INVESTMENT ADVISER		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?		
10.	` '	Is the related person registered with a foreign financial regulatory authority? If the answer is vest list the name and country, in English of each foreign financial regulatory authority with which the related person is re-	⊙ nistere	O
10.	(a) (b)	Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? 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 registered. Name of Country/English Name of Foreign Financial Regulatory Authority		- 11
10.	` '	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is required.		- 11
	(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 reconstructed in the country/English Name of Foreign Financial Regulatory Authority	gistere	ed.
	(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 reconstructed Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority	gistere	- 11
11.	(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 reconstructed Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority	gistere	ed.
11.	(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 reconstructed in the related person is reconstructed in the related person is reconstructed. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons?	gistere	ed.
11.	(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 reconstructed in the related person is reconstructed in the related person is reconstructed. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons?	gistere	ed.
11. 12.	(b) Do y Do y	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is reconstructed Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location?	gistere	ed.
11. 12.	(b) Do y Do y	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended in the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location?	gistere	ed.
11. 12.	(b) Do y Do y	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is reconstructed Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location?	gistere	ed.
11. 12.	(b) Do y Do y Lega TD S	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended in the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC	gistere	ed.
11. 12.	(b) Do y Do y Lega TD S	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended in the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC Bary Business Name of Related Person:	gistere	ed.
11. 12.	(b) Do y Do y Lega TD S	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended in the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC	gistere	ed.
11. 12.	(b) Do y Do y Lega TD S Prim TD S	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended in the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC Bary Business Name of Related Person:	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended in the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? BY INAME OF Related Person: SECURITIES (USA) LLC BY INAME OF Related Person: SECURITIES (USA) LLC	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S Relai 8 - 3 or	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is replaced in the related person is replaced in the related person in the related person is replaced in the related person in	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S Relat 8 - 3	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is replaced in the related person is replaced in the related person in the related person is replaced in the related person in	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S Relai 8 - 3 or Othe	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended in English Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC Harry Business Name of Related Person: SECURITIES (USA) LLC Arted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 36747 Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S Relai 8 - 3 or Othe	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended to the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC Harry Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIES (USA) LLC Attendary Business Name of Related Person: SECURITIE	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S Relai 8 - 3 or Othe	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended to the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC Harry Business Name of Related Person: SECURITIES (USA) LLC SECURITIES	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S Relait 8 - 3 or Othee Relait (a)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended to the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority For any Linked Kingdom - Financial Conduct Authority For any Linked Kingdom - Financial Regulatory For any Linked	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S Relait 8 - 3 or Othee Relait (a)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended to the related person is recommended. Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC Harry Business Name of Related Person: SECURITIES (USA) LLC SECURITIES	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S Relait 8 - 3 or Othee Relait (a)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended in the related person is recommended. The second is recommended in the related person is recommended in the related person share any supervised persons? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended. The second is recommended in the related person is recommended in the related person share any supervised persons? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended. The second is recommended in the related person share of related person is second in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended.	gistere	ed.
11. 12. 1. 2.	(b) Do y Do y Lega TD S Prim TD S Relait 8 - 3 or Othee Relait (a)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended in the related person is recommended. The second is recommended in the related person is recommended in the related person share any supervised persons? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended. The second is recommended in the related person is recommended in the related person share any supervised persons? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is recommended. The second is recommended in the related person share of related person is second in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended. The related person is recommended in the related person is recommended in the related person is recommended.	gistere	ed.
11. 12. 1. 2. 3.	(b) Do y Lega TD S Prim TD S Relai 8 - 3 or Other Relai (a) (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 recommended in the related person is recommended. The proof of the person is recommended in the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC S	gistere	ed.
11. 12. 1. 2. 3.	(b) Do y Lega TD S Prim TD S Relai 8 - 3 or Othe Relai (a) (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 recommended in the related person is recommended. In the same of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority You and the related person share any supervised persons? You and the related person share the same physical location? All Name of Related Person: SECURITIES (USA) LLC Harry Business Name of Related Perso	gistere	ed.

	(c) L registered municipal advisor		
	(d) \square registered security-based swap dealer		
	(e) \square major security-based swap participant		
	(f) \square commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g) 🗖 futures commission merchant		
	(h) anking or thrift institution		
	(i)		
	(j) accountant or accounting firm		
	(k) 🗖 lawyer or law firm		
	(I) Insurance company or agency		
	(m) pension consultant		
	(n)		
	(o) \square 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?	0	•
			_
7.	Are you and the related person under common control?	•	_
		· ·	О
0	(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> ?	0	•
0.		U	· ·
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	\circ
	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 related person's office responsible for custody of your clien	's'	
	assets:		
	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:		
	If this address is a private residence, theth this box.	Vac	. No
٩	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?		_
١٠.		0	0
	(b) If the answer is yes, under what exemption?		
10.	. (a) Is the related person registered with a foreign financial regulatory authority ?	\circ	⊙
	(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 reg	istere	ed.
	No Information Filed		
11.	. Do you and the related person share any supervised persons?	0	⊙
12.	. Do you and the <i>related person</i> share the same physical location?	0	\odot
1.	Legal Name of Related Person:		
	TD WATERHOUSE PRIVATE INVESTMENT COUNSEL INC.		
2.	Primary Business Name of Related Person:		
	TD WATERHOUSE PRIVATE INVESTMENT COUNSEL INC.		
_			
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	- -		
	or Other		
	Other		
4.	Related Person's		
٦.			
	(a) CRD Number (if any):		
	(b) CIK Number(s) (if any):		
	No Information Filed		
5.	Related Person is: (check all that apply)		
	(a) Droker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b) ✓ other investment adviser (including financial planners)		
	(c) \square registered municipal advisor		
	(d) registered security-based swap dealer		
	(e) major security-based swap participant		
	(c) Indigor security based swap participant		

	` '	commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant		
	(g) (h)			
	(i)	trust company		
	٠,	accountant or accounting firm		
	(k)	☐ lawyer or law firm		
	٠,	insurance company or agency		
	(m)			
	(n) (o)			
	(b)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(1-7		Yes	No
6.	Do y	ou control or are you controlled by the related person?	0	⊚
7.	Are v	you and the <i>related person</i> under common <i>control</i> ?	•	0
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> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clie</i>	nts'	
		assets: 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:		
	(5)	If the veleted names is an investment advisor is it evenue from verishables?		No
9.	. ,	If the related person is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption?	⊙	0
	(0)	- INVESTMENT INDUSTRY REGULATORY AUTHORITY OF CANADA (IIROC)		
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	•	0
	(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 re-	egistere	ed.
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Canada - Alberta Securities Commission		
		Canada - British Columbia Securities Commission		
		Canada - Manitoba Securities Commission		
		Canada - New Brunswick Securities Commission		
		Canada - Newfoundland and Labrador, Financial Services Regulation Division		
		Canada - Northwest Territories, Office of the Registrar of Securities		
		Canada - Nova Scotia Securities Commission		
		Canada - Nunavut, Registrar of Securities		
		Canada - Ontario Securities Commission		
		Canada - Prince Edward Island, Securities Office		
		Canada - Quebec, Financial Markets Authority Canada - Saskatchewan Financial Services Commission		
	D	Canada - Yukon Territories, Registrar of Securities		
11.	ро у	ou and the <i>related person</i> share any <i>supervised persons</i> ?	0	⊙
12.	Do v	ou and the <i>related person</i> share the same physical location?	0	\odot
	,			
1.	Lega	I Name of <i>Related Person</i> : SSET MANAGEMENT INC.		
	Lega TD A			
2.	Lega TD A Prim TD A	ASSET MANAGEMENT INC. ary Business Name of <i>Related Person</i> :		
2.	Lega TD A Prim TD A	ASSET MANAGEMENT INC. ary Business Name of <i>Related Person</i> : ASSET MANAGEMENT		

(a) CRD Number (if arry): (b) CIK Number(s) (if arry): No Information Field 5. Related Person is: (check all that apply) (a) broken-dealer, municipal securities dealer, or government securities broker or dealer (b) or the investment advisor (including financial planners) (c) registered municipal advisor (d) registered scurrity beads who dealer (e) major security-based swap participant (f) commonly pool operator or commodity trading advisor (whether registered or exempt from registration) (g) futures commission merchant (h) busings printfi institution (i) trusts commission merchant (ii) trusts commission merchant (iv) busings printfi institution (ii) requirement advisor or dealer (iv) person commitment (iv) lawyer or law firm (iv) person commitment (iv) represent comm	4.	Rela	ted Person's		
S. Related Person is: (check all that apply) (a) broker-dealer, municipal securities dealer, or government securities broker or dealer (b) of other investment advice (including financial planners) (c) registered municipal advices (d) registered municipal advices (e) major security based swap participant (f) commodity pool operative or crumedity trading advisor (whether registered or exempt from registration) (g) futures commission merchant (h) barriage or their finishtution (i) trust company (ii) accountant or accounting firm (ii) lournature or accounting firm (iii) lournature or accounting firm (iv) barriage or law finishtution (iii) rest attack broker or dealer (iv) spinuser or syniciliate of initial participality (or equivalent), excluding pooled investment vehicles (iv) spinuser or syniciliate of initial participality (or equivalent), excluding pooled investment vehicles (iv) spinuser or syniciliate of initial participality (or equivalent), excluding pooled investment vehicles (iv) spinuser or syniciliate of initial participality (or equivalent), excluding pooled investment vehicles (iv) spinuser or syniciliate of initial participality (or equivalent), excluding pooled investment vehicles (iv) spinuser or syniciliate of initial participality (or equivalent), excluding pooled investment vehicles (iv) spinuser or syniciliate of initial participality (or equivalent), excluding pooled investment vehicles (iv) spinuser or syniciliate of initial participality (or equivalent), excluding pooled investment vehicles (iv) spinuser or syniciliate of initial participality (or equivalent), excluding pooled investment vehicles (iv) spinuser registering or registered with the SEC and you have answered yea, in question 8 (a) always, have you overcome the presumption by your clears or excluding or registered with the SEC and you have answered yea, in question 8 (a) always, have you overcome the presumption by your clears or exclusive (or exclusive spinus		(a)	CRD Number (if any):		
5. Related Person is: (check all that apply) (a) broker-dealer, musicipal securities dealer, or government securities broker or dealer (b) dother investment advisor (including financial planners) (c) registered succipits dealer with advisor (d) registered succipits and advisor (d) registered succipits and support of the succession of the succ		(b)	CIK Number(s) (if any):		
(a) broker dealer, municipal securities dealey, or government securities broker or dealer (b) of other investment advise (including financial planners) (c) registered municipal advisor (including financial planners) (d) registered municipal advisor (including financial planners) (e) major security-based swap participant (including financial planners) (f) commontly pool operator or commodity trading advisor (whether registered or exempt from registration) (g) filtures commission merchant (including pooled filture) (h) basing or thrift including or thrift including or thrift including or thrift including pooled filture (including pooled filture) (h) lawyer or law filt (i) lawyer or law filt (i) lawyer or law filt (i) sponsor or syndictor of limited partnerships (or equivalent), excluding pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), excluding pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (ii) sponsor or syndictor of limited partnerships (or equivalent), or pooled limited partnerships (ii) sponsor or syndictor of dealer of sponsor syndictor of limited partnerships (iii) sponsor or syndictor of limited partnerships (or equivalent), or sponsor or syndictor of limited partnerships (iii) sponsor or syndictor of sponsor or sponsor or syndictor of limited partnerships of limited partnerships (iii) sponsor or syndictor of limited partners			No Information Filed		
(a) broker dealer, municipal securities dealey, or government securities broker or dealer (b) of other investment advise (including financial planners) (c) registered municipal advisor (including financial planners) (d) registered municipal advisor (including financial planners) (e) major security-based swap participant (including financial planners) (f) commontly pool operator or commodity trading advisor (whether registered or exempt from registration) (g) filtures commission merchant (including pooled filture) (h) basing or thrift including or thrift including or thrift including or thrift including pooled filture (including pooled filture) (h) lawyer or law filt (i) lawyer or law filt (i) lawyer or law filt (i) sponsor or syndictor of limited partnerships (or equivalent), excluding pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), excluding pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (i) sponsor or syndictor of limited partnerships (or equivalent), or pooled investment vehicles (ii) sponsor or syndictor of limited partnerships (or equivalent), or pooled limited partnerships (ii) sponsor or syndictor of dealer of sponsor syndictor of limited partnerships (iii) sponsor or syndictor of limited partnerships (or equivalent), or sponsor or syndictor of limited partnerships (iii) sponsor or syndictor of sponsor or sponsor or syndictor of limited partnerships of limited partnerships (iii) sponsor or syndictor of limited partners					
(b) Content investment advisor (including financial planners) (c) registered security-based swap dealer (d) registered security-based swap dealer (e) registered security-based swap porticipont (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) future commission merchant (h) barlong or thirt institution (g) commodity pool operator or commodity and institution commodity accountant or executivity for executions or executivity for ex	5.	Rela	ted Person is: (check all that apply)		
Columbrate Col		(a)	\square broker-dealer, municipal securities dealer, or government securities broker or dealer		
(c) registered security-based way participant (c) ranges security-based way participant (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) thurse commission merchane (hturse company (m) banking or thrift institution (hturse company (m) pendion consultant (lo) louver or law firm (lo) louver or law firm (lo) pendion consultant cons		(b)	other investment adviser (including financial planners)		
(c) major security-based swap partitions. (f) cannot modify pool operator or commodity trading advisor (whether registered or exempt from registration) (g) futures commission menchent (h) barbon or trust company eccountar or eccounting firm (c) lawyer or law firm (d) lawyer or law firm (d) insurance company or agency (m) pendanc consultant (f) real estate broker or dealer (g) sporsor or syndicate of limited partmerships (or equivalent), excluding pooled investment vehicles (g) sporsor or syndicate of limited partmerships (or equivalent), excluding pooled investment vehicles (g) sporsor or syndicate of limited partmerships (or equivalent), excluding pooled investment vehicles (g) sporsor or syndicate of limited partmerships (or equivalent), excluding pooled investment vehicles (g) sporsor, general partner, managing member (or equivalent), excluding pooled investment vehicles (g) sporsor, general partner, managing member (or equivalent), excluding pooled investment vehicles Yes No Do you control or are you controlled by the related person? Are you and the related person act as a qualified custodian for your clients indicate of the related person and the related person and the related person act as a qualified custodian for your clients indicate (pursuant to rule 266(4)-2(g)(5)) from the related person and thus are not required to obtain a surprise examination for your clients indicate (pursuant to rule 266(4)-2(g)(5)) from the related person and thus are not required to obtain a surprise examination for your clients indicate to obtain a surprise examination for your clients indicate to obtain a surprise examination of the related person is determined by the purpose of the related person is determined by your clients indicate to obtain a surprise examination for your clients indicate to obtain a surprise examination for your clients indicate person is a finite client person is person is a finite person is		. ,			
(c) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (d) Evitare commission merchant (e) Evitare commission merchant (f) Evitare commission (f) Evitare for Evita		. ,			
(a) tutures commission merchant		` '			
(i) trust company () lawyer or law film () real estate broker or dealer () 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?		` '			
(c) □ accountant or accounting firm (d) □ lewyer or law firm (d) □ Insurance company or agency (m) □ persian consultant (o) □ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (d) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (d) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (e) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles Yes No (d) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles Yes No (e) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles Yes No (f) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles Yes No (e) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles Yes No (f) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles Yes No (e) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles Yes No (f) □ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles Yes No (f) □ sponsor or syndicator or syndicator or syndicator or subject		(h)	\square banking or thrift institution		
Column C		` '			
The presence company or agency The presence company or agency The presence consultant The presence company or agency The presence company or agency The presence company or agency or delate proker or dealer					
(m) ☐ pension consultant (n) ☐ real estate broker or dealer (n) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (p) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles **Yes No (p) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles **Yes No (p) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles **Yes No (p) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles **Yes No (p) ☐ sponsor or syndicator or equivalent partnerships (or equivalent) or limited partnerships (or equivalent		` '			
(a) ☐ real estate broker or dealer (b) ☐ sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (c) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles (d) ☐ sponsor or syndicator of limited partnerships (or equivalent) of pooled investment vehicles Ves No C		. ,			
(p) □ sponsor, general partner, managing member (or equivalent) of pooled investment vehicles Yes No Do you control or are you controlled by the related person? Are you and the related person under common control? Are you and the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients? Of Go So Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients? Of Go 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(0/5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or securities that are maintained at the related person? (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' assests: Number and Street 1: Number and Street 2: City: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: Yes No (b) If the answer is yes, under what exemption? CANADIAN INVESTMENT ADVISOR 10. (a) Is the related person is an investment adviser, is it exempt from registration? (c) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. Name of Country/English Name of Foreign Financial Regulatory Authority Canada - Alberta Securities Commission Canada - New Surfused Securities Commission Canada - Pinice Edward Island, Securities Office Canada - Ontario Securities Commission Canada - Pini		(n)	_ `		
New Notice of Commission 6. Do you control or are you controlled by the related person? 7. Are you and the related person under common control? 8. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients? 9. (a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients? 9. (a) If you have an surprise examination for your clients funds or securities that are maintained at the related person and thus are not required to obtain a surprise examination for your clients funds or securities that are maintained at the related person? (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: 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: Yes No (b) If the related person is an investment adviser, is it exempt from registration? (c) If the answer is yes, under what exemption? CANADIAN INVESTMENT ADVISOR 10. (a) Is the related person registered with a foreign financial regulatory authority? (a) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. Name of Country/English Name of Foreign Financial Regulatory Authority Canada - Alberta Securities Commission Canada - Nouthwest Territories, Office of the Registrar of Securities Canada - Nourhwest Territories, Office of the Registrar of Securities Canada - Nourhwest Territories, Office of the Registrar of Securities Canada - Nourhwest Territories, Office of the Registrar of Securities Canada - Nourhwest Territories, Commission Canada - Nourhwest Territories, Registrar of Securities 11. Do you and the related person share any supervised persons?		(o)	\square sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
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(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: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: Yes No Yes No (b) If the related person is an investment adviser, is it exempt from registration? (c) C (d) If the answer is yes, under what exemption? CANADIAN INVESTMENT ADVISOR (d) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. Name of Country/English Name of Foreign Financial Regulatory Authority Canada - Alberta Securities Commission Canada - Manitoba Securities Commission Canada - NewFoundland and Labrador, Financial Services Regulation Division Canada - NewFoundland and Labrador, Financial Services Regulation Division Canada - Northwest Territories, Office of the Registrar of Securities Canada - Ontario Securities Commission Canada - Prince Edward Island, Securities Office Canada - Saskatchewan Financial Services Commission Canada - Saskatchewan Financial Services Commission Canada - Yukon Territories, Registrar of Securities Canada - Yukon Territories, Registrar of Securities Canada - Yukon Territories, Registrar of Securities 11. Do you and the related person share any supervised persons?					
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Canada - Yukon Territories, Registrar of Securities 11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?			Canada - Quebec, Financial Markets Authority		
11. Do you and the <i>related person</i> share any <i>supervised persons</i> ?			Canada - Saskatchewan Financial Services Commission		\neg
			Canada - Yukon Territories, Registrar of Securities		
	11.	Do y	ou and the related person share any supervised persons?	•	0
12. Do you and the <i>related person</i> share the same physical location?				_	
	12.	Do y	ou and the <i>related person</i> share the same physical location?	\circ	\odot

1.	-	l Name of <i>Related Person</i> : ECURITIES INC.		
2.		ary Business Name of <i>Related Person</i> : ECURITIES INC.		
3.	Relat	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe NRD	r #85860		
4.		ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n)	 □ 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 (whether registered or exempt from registration) □ 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), 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?	0	•
7.	Are y	you and the related person under common control?	⊙	О
8.	(b)	If you are a sixtanian as a sixtanian with the CCC and you have a second liver the contribution ((a) above have		⊙ ○
		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:		.
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	(b)	If the answer is yes, under what exemption?		~
10.	` '	Is the related person registered with a foreign financial regulatory authority? If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is regist Name of Country/English Name of Foreign Financial Regulatory Authority Canada - Alberta Securities Commission Canada - British Columbia Securities Commission Canada - Manitoba Securities Commission Canada - New Brunswick Securities Commission Canada - Newfoundland and Labrador, Financial Services Regulation Division Canada - Northwest Territories, Office of the Registrar of Securities	_	O d.

		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Canada - Nova Scotia Securities Commission		Ш
		Canada - Nunavut, Registrar of Securities		Ш
		Canada - Ontario Securities Commission		Ш
		Canada - Prince Edward Island, Securities Office		Ш
		Canada - Quebec, Financial Markets Authority		
		Canada - Saskatchewan Financial Services Commission		
		Canada - Yukon Territories, Registrar of Securities		
		Other - INVESTMENT INDUSTRY REGULATORY AUTHORITY OF CANADA (IIROC)		
11.	Do v	o you and the <i>related person</i> share any <i>supervised persons</i> ?	0.0	
	,	.,	0.0	
12.	Do y	o you and the <i>related person</i> share the same physical location?	○ ●	
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1.	_	egal Name of <i>Related Person</i> : ORONTO-DOMINION BANK		
2.		rimary Business Name of <i>Related Person</i> : D BANK		
3.	Relat	elated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or	r		
	Othe	ther		
4.		elated Person's		
	(a)	a) CRD Number (if any):		
	(b)	c) CIK Number(s) (if any):		
	(5)	No Information Filed		
5.		elated Person is: (check all that apply) a)		
	(b)	o) \square other investment adviser (including financial planners)		
	(c)	registered municipal advisor		
	. ,	d)		
		e) 🔲 major security-based swap participant		
		g)		
		n) 🔽 banking or thrift institution) 🗔 trust company		
	. ,	· -		
		x)		
) 🔲 insurance company or agency		
	(m)	m) pension consultant		
	(n)	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 y	o you control or are you controlled by the related person?	⊙ C	1
_				
/.	Are y	re you and the <i>related person</i> under common <i>control</i> ?	0.0	
8.	(a)	a) Does the related person act as a qualified custodian for your clients in connection with advisory services you	provide to <i>clients</i> ?	
	(b)	o) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the related prequired to obtain a surprise examination for your clients' funds or securities that are maintained at the related.	you overcome the ${f C}$ ${f @}$	
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office respon		
		assets:		
		Number and Street 1: Number and Street 2: 66 WELLINGTON STREET WEST		
			stal Code:	
		TORONTO Canada M5K 1A2		

		If this address is a private residence, check this box:			
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes C	. No	
	(b)	If the answer is yes, under what exemption?			
10.	(a)	Is the related person registered with a foreign financial regulatory authority ?	•	О	,
	(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 regis. Name of Country/English Name of <i>Foreign Financial Regulatory Authority</i>	stere	ed.	٦
		Other - OTHER - OFFICE OF THE SUPERINTENDENT OF FINANCIAL INSTITUTIONS			1
11.	Do y	ou and the related person share any supervised persons?	0	•	_
			~	٠	
12.	Do y	ou and the <i>related person</i> share the same physical location?	0	•	į
					Ī
1.	_	Il Name of <i>Related Person</i> : ONTO-DOMINION (SOUTH EAST ASIA) LIMITED			
2.	Prim	ary Business Name of <i>Related Person</i> :			
	TOR	ONTO-DOMINION (SOUTH EAST ASIA) LIMITED			
3.	Rela	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	or				
	Othe				
4.		ted Person's			
	(a)	CRD Number (if any):			
	(b)	CIK Number(s) (if any): No Information Filed			
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o)	□ 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 (whether registered or exempt from registration) futures commission merchant	Yes	; No	D
6.	Do y	ou control or are you controlled by the related person?	0	0	
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	•	0	į
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	$^{\circ}$	•)
	(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> ?	0	0	1
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> assets:	<i>5</i> ′		
		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:			
			Yes	No	3

	a) If the related person is an investment adviser, is it exempt from registration?	0.6
(b) If the answer is yes, under what exemption?	
.0. (• c
(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 pe</i> Name of Country/English Name of Foreign Financial Regulatory Authority	rson is registered.
	Singapore - Monetary Authority of Singapore	
1 Г	Do you and the <i>related person</i> share any <i>supervised persons</i> ?	
.I. L	ou and the related person share any supervised persons:	• (
.2. [Do you and the <i>related person</i> share the same physical location?	0.6
em	7 Private Fund Reporting	
		Yes N
. Ar	e you an adviser to any <i>private fund</i> ?	© (
ne ex fui	"yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstance ext sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or report empt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to nd 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 wit ivate fund. You must, instead, complete Section 7.B.(2) of Schedule D.	ting as an SEC any such private
alp	either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in number to habetical 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 S e same code or designation in place of the fund's name.	
ECT:	ION 7.B.(1) Private Fund Reporting	
	Funds per Page: 15 V Total Funds: 2	
A. P	Funds per Page: 15 V Total Funds: 2 PRIVATE FUND	
	PRIVATE FUND	
Info	PRIVATE FUND private Fund	
	PRIVATE FUND primation About the Private Fund (a) Name of the private fund:	
Info	PRIVATE FUND Cormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC	
Info	PRIVATE FUND Cormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number:	
Info	PRIVATE FUND Cormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC	
Info	PRIVATE FUND Ormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also)	
Info	PRIVATE FUND Ormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also)	
Info	PRIVATE FUND Ormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also)	
Inf	PRIVATE FUND (a) Name of the <i>private Fund</i> : AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) <i>Private fund</i> identification number: (include the "805-" prefix also) 805-1970152858	
1 .	PRIVATE FUND Ormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also) 805-1970152858 Under the laws of what state or country is the private fund organized:	
1. 2.	PRIVATE FUND Ormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also) 805-1970152858 Under the laws of what state or country is the private fund organized: State: Country: Delaware United States	
Inf (PRIVATE FUND Ormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also) 805-1970152858 Under the laws of what state or country is the private fund organized: State:	
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1. 2.	PRIVATE FUND Transformation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also) 805-1970152858 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): Name of General Partner, Manager, Trustee, or Director EPOCH INVESTMENT PARTNERS, INC.	iund.
1. 2.	PRIVATE FUND Transformation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also) 805-1970152858 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): Name of General Partner, Manager, Trustee, or Director EPOCH INVESTMENT PARTNERS, INC.	iund.
1. 2. 3.	PRIVATE FUND Ormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also) 805-1970152858 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): Name of General Partner, Manager, Trustee, or Director EPOCH INVESTMENT PARTNERS, INC. (b) If filling an umbrella registration, identify the filling adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private for No Information Filed The private fund (check all that apply; you must check at least one):	
1. 2.	PRIVATE FUND Ormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also) 805-1970152858 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): Name of General Partner, Manager, Trustee, or Director EPOCH INVESTMENT PARTNERS, INC. (b) If filling an umbrella registration, identify the filling adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private for No Information Filed	of 1940
1. 2.	PRIVATE FUND Ormation About the Private Fund (a) Name of the private fund: AEON GLOBAL ABSOLUTE RETURN FUND, LLC (b) Private fund identification number: (include the "805-" prefix also) 805-1970152858 Under the laws of what state or country is the private fund organized: State:	of 1940

•	a) Is this a "master fund" in a master-feeder arrangement?	\circ	0
(t	p) 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	N
(0	c) Is this a "feeder fund" in a master-feeder arrangement?	0	
(0	I) 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 private fund:		
	Private fund identification number: (include the "805-" prefix also)		
	OTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section or the master-feeder arrangement or reporting on the funds separately.	7.B.(1)
	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 ea	ch
	No Information Filed		
N	OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all	of th	ei
	ssets 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 oultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	ssuec	ł
		Yes	N
•	a) Is this <i>private fund</i> a "fund of funds"?	0	
	OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment regardless of whether they are also <i>private funds</i> or registered investment companies.	vehic	les
(t	p) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	
		Yes	
	uring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment ompany Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
W	/hat type of fund is the <i>private fund</i> ?		
	bedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital fund C Other private	ate fu	ın
N	OTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
	urrent gross asset value of the <i>private fund</i> : 54,668,809		
ne	<u>ership</u>		
	inimum investment commitment required of an investor in the <i>private fund</i> : 5,000,000		
	OTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in th rganizational documents of the fund).	е	
A	pproximate number of the <i>private fund's</i> beneficial owners: 8		
W 7°	hat is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
•	a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		

					Nο
	(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
	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :			
Vali	- Ad	lvisory Services			
IUU	LAU	INISMLY SELVICES	Ye	s I	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	0	ı	•
	. ,	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 answ question 17.(a) is "no," leave this question blank.	er to		
		No Information Filed			
			Ye	s I	No
		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	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 to question 18.(a) is "no," leave this question blank.	ne ans	we	r
		No Information Filed			
			Ye	s I	No
		your <i>clients</i> solicited to invest in the <i>private fund</i> ?	⊙		0
	NOI	TE: For purposes of this question, do not consider feeder funds of the private fund.			
	App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?			
Priv	ate	<u>Offering</u>	Ye	s I	No
21.	Has	the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	0		O
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):			
		rm D file number 1-147198		_	_
3. SE	RVI	CE PROVIDERS			
Aud	itor				
		<u>s</u>	V		
23.			Yes		_
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?	•		0
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	⊙ ⊙		0
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 audit 	⊙ ⊙		0
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 audit you must complete questions (b) through (f) separately for each auditing firm.	⊙ ⊙		0
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 audit 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	⊙ ⊙		0
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 audit 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: 	⊙ ⊙		0
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 audit 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: COHEN & COMPANY, LTD. (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:	⊙ ⊙		0
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," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one audit 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: COHEN & COMPANY, LTD. (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): 	⊙ ⊙	rm,	00,
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 audit 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: COHEN & COMPANY, LTD. (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:	⊙ ⊙	rm,	000
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 audit 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: COHEN & COMPANY, LTD. (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: CLEVELAND Ohio United States	⊙ ⊙ ⊙ iting fir	No.	000
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 audit 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: COHEN & COMPANY, LTD. (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: CLEVELAND Ohio United States	⊙ ⊙ ⊙ iting fir	No.	000

	If yes, Public Company Accounting Oversight Board-Assigned Number: 925			
(f)	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversigh accordance with its rules?	nt Board in	•	0
			Yes	N
	re the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private</i> vestors?	fund's		C
	o all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contains. Yes No C Report Not Yet Received	ain unqualified	opini	ons
If yo	you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your responsailable.	se when the re	eport i	s
e Broke	<u>ker</u>			
a) Does	pes the <i>private fund</i> use one or more prime brokers?		Yes O	N
If the	the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private find</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	und uses. If th	ne <i>pri</i> v	ate
	No Information Filed			
If th	pes the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> and uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.	l uses. If the μ	Yes ⊙ orivate	C
(a) Does If the	pes the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i>	f uses. If the μ	•	C
(a) Does If the fund Add	nees the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> and uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.		⊙ orivate	
If the fund Add	nees the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> and uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. dditional 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>		⊙ orivate	_
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If the fund Add If fun (b) (c) (d)	the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. dditional 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> fund uses more than one custodian, you must complete questions (b) through g) below for each custodian the <i>private fund</i> fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian: BROWN BROTHERS HARRIMAN (c) Primary business name of custodian: BROWN BROTHERS HARRIMAN (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: NEW YORK New York United States (e) Is the custodian a <i>related person</i> of your firm?	nd uses. If the	© private	e

Yes No

Administrator

26. (a) Does the $\ensuremath{\textit{private fund}}$ use an administrator other than your firm?

(d) Is the administrator a <i>related person</i> of your firm? (e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors? (f) Yes (provided to all investors) C 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) <i>private fund's</i> investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable." (a) During your last fiscal year, what percentage of the <i>private fund's</i> assets (by value) was valued by a <i>person</i> , such as an administrator, that is no your related person? (a) Now (include only those assets where (i) such <i>person</i> 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 <i>person</i> .		Additional Administrator Informat	ion : 1 Record(s) Filed.		
COMMONWEALTH SHAREHOLDER SERVICES, INC. (c) Location of administrator (city, state and country): City: State: Country: RICHMOND Virginia United States Yes N (d) Is the administrator a related person of your firm? (e) Does the administrator a related person of your firm? (e) Does the administrator prepare and send investor account statements to the private fund's investors? (f) Yes (provided to all investors) C Some (provided to some but not all investors) C 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.' 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 no our related person? Oncourde only those assets where (f) such person carried out the valuation procedure established for that asset, if any, including obtaining any elevant quotes, and (fi) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including locations) was the valuation determined by such person. **Reters** *Yes** *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 **ADI GLOBAL EQUITY SHAREHOLDER YIELD FUND, LLC **D Private fund identification number: (include the "sibot" perkix also) 80.5-847/578591 **Index fund identification number: (include the "sibot" perkix also) 80.5-847/578591					ore than one
COMMONWEALTH SHAREHOLDER SERVICES, INC. (c) Location of administrator (ciby, state and country): City: State: Country: RICHMOND Virginia United States Yes N (d) Is the administrator a related person of your ffim? (e) Does the administrator a related person of your ffim? (e) Does the administrator arelated person of your ffim? (f) If the answer to question 26 (e) is "no" or "some," who sends the investors? C 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." Puring 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 no our related person? Onclude only those assets where (f) such person carried out the valuation procedure established for that asset, if any, including obtaining any selevant quotes, and (fi) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including locations) was the valuation determined by such person. **Reference** *Yee** *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: **ABON GLOBAL EQUITY SHAREHOLDER YIELD FUND, LLC **D Private fund (dentification number: (include the "805"- prefix also) **BON SCIONAL EQUITY SHAREHOLDER YIELD FUND, LLC **D Private fund (dentification number: (include the "805"- prefix also) **BON SCIONAL EQUITY SHAREHOLDER YIELD FUND, LLC **D Private fund (dentification number: (include the "805"- prefix also) **BON SCIONAL EQUITY SHAREHOLDER YIELD FUND, LLC **D Private fund (dentification number: (include the "805"- pr		(h) Name of administrator:			
City: State: Country: RCHMOND Virginia United States Ves N (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? (e) Yes (provided to all investors) CSome (provided to some but not all investors) C 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 investors account statements are not sent to the (rest of the) private fund's investors, respond "not applicable." (b) 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, respond "not applicable." (c) 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, respond "not applicable." (d) Is 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, respond "not applicable." (e) Does the state fiscal year, what percentage of the private fund's assets (by value) was valued by a person, such as an administrator, that is no our related person? (f) If the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including locations) was the valuation determined by such person. (e) Does the private fund uses the services of someone other than you or your employees for marketing purposes? (f) Yes 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 26.(a) is "yes," respond to questions (b) through (b) blow 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 the private fund uses. If the private fund is			R SERVICES, INC.		
City: State: Country: RCHMOND Virginia United States Ves N (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? (e) Yes (provided to all investors) CSome (provided to some but not all investors) C 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 investors account statements are not sent to the (rest of the) private fund's investors, respond "not applicable." (b) 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, respond "not applicable." (c) 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, respond "not applicable." (d) Is 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, respond "not applicable." (e) Does the state fiscal year, what percentage of the private fund's assets (by value) was valued by a person, such as an administrator, that is no our related person? (f) If the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including locations) was the valuation determined by such person. (e) Does the private fund uses the services of someone other than you or your employees for marketing purposes? (f) Yes 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 26.(a) is "yes," respond to questions (b) through (b) blow 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 the private fund uses. If the private fund is					
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© 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 investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable." (g) 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, respond "not applicable." (g) If the answer is a send of the private fund's assets (by value) was valued by a person, such as an administrator, that is no our related person? (g) Owe in the valuation procedure established for that asset, if any, including obtaining any alevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including illocations) was the valuation determined by such person. (g) Does the private fund use the services of someone other than you or your employees for marketing purposes? (g) Does the private fund use the services of someone other than you or your employees for marketing purposes? (g) Does the private fund use the services of someone other than you or your employees for marketing purposes? (g) Does the private fund use the services of someone other than you or your employees for marketing purposes? (g) Does the private fund use the services of someone other than you or your employees for marketing purposes? (g) Does the private fund use the services of someone other than you or your employees for marketing purposes? (g) Does the private fund use the services of someone other than you or your employees for marketing purposes? (g) Does the private fund use the services of someone other than you or your employees for marketing purposes? (g) Does the private fund use the services of someone other than you or your employees for marketing purposes? (g) Does the private fun		(d) Is the administrator a related pe	erson of your firm?		o ⊚
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AEON GLOBAL EQUITY SHAREHOLDER YIELD FUND, LLC b) Private fund identification number: (include the "805-" prefix also) 805-8477578591 Under the laws of what state or country is the private fund organized: State: Country:	ete a)	vant quotes, and (ii) the valuation used cations) was the valuation determined leads on the valuation was the valuation when the valuation valuation was the valuation valuation with valuation valuatio	I for purposes of investor subspy such <i>person</i> . of someone other than you constant age on 28.(a) is "yes," respond to an one marketer you must constant age on 28.(a) is "yes," respond to an one marketer you must constant age.	r your <i>employees</i> for marketing purposes? nt, consultant, finder, introducer, municipal advaces (b) through (g) below for each such applete questions (b) through (g) separately for	Yes visor or other solicitor, or marketer the private func
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(include the "805-" prefix also) 805-8477578591 Inder the laws of what state or country is the <i>private fund</i> organized: State: Country:	ete a) VAT	vant quotes, and (ii) the valuation used cations) was the valuation determined leads on the private fund use the services. You must answer "yes" whether the pesimilar person. If the answer to questives. If the private fund uses more that	I for purposes of investor subspy such <i>person</i> . of someone other than you constant age on 28.(a) is "yes," respond to an one marketer you must constant age on 28.(a) is "yes," respond to an one marketer you must constant age.	r your <i>employees</i> for marketing purposes? nt, consultant, finder, introducer, municipal advaces (b) through (g) below for each such applete questions (b) through (g) separately for	Yes visor or other solicitor, or marketer the private func
805-8477578591 Inder the laws of what state or country is the <i>private fund</i> organized: State: Country:	ete a) WAT	vant quotes, and (ii) the valuation used cations) was the valuation determined learns Does the private fund use the services You must answer "yes" whether the pesimilar person. If the answer to questives. If the private fund uses more the uses. If the private fund uses more that the perivate fund uses more that the private fund uses more than the private fund.	I for purposes of investor subsets of such person. of someone other than you of someone other than you of serson acts as a placement age on 28.(a) is "yes," respond to an one marketer you must con No In	r your <i>employees</i> for marketing purposes? nt, consultant, finder, introducer, municipal advaces (b) through (g) below for each such applete questions (b) through (g) separately for	Yes visor or other solicitor, or marketer the private func
State: Country:	ete a) VAI mai	vant quotes, and (ii) the valuation used cations) was the valuation determined leads on the private fund use the services. You must answer "yes" whether the pesimilar person. If the answer to questionses. If the private fund uses more that uses. If the private fund uses more that the perivate fund uses more that the private fund uses. If the private fund uses more that the perivate fund identification number:	I for purposes of investor subsets of such person. of someone other than you of someone other than you of serson acts as a placement age on 28.(a) is "yes," respond to an one marketer you must con No In	r your <i>employees</i> for marketing purposes? nt, consultant, finder, introducer, municipal advaces (b) through (g) below for each such applete questions (b) through (g) separately for	Yes visor or other solicitor, or marketer the private func
State: Country:	ete a) WAT	vant quotes, and (ii) the valuation used cations) was the valuation determined leads on the private fund use the services. You must answer "yes" whether the pesimilar person. If the answer to questives. If the private fund uses more that uses. If the private fund uses more that whether the perivate fund uses more that the private fund uses. If the private fund uses more that the private fund: AEON GLOBAL EQUITY SHAREHOLDER Private fund identification number: (include the "805-" prefix also)	I for purposes of investor subsets of such person. of someone other than you of someone other than you of serson acts as a placement age on 28.(a) is "yes," respond to an one marketer you must con No In	r your <i>employees</i> for marketing purposes? nt, consultant, finder, introducer, municipal advaces (b) through (g) below for each such applete questions (b) through (g) separately for	Yes visor or other solicitor, or marketer the private func
,	ete a) wat	vant quotes, and (ii) the valuation used cations) was the valuation determined leads on the private fund use the services. You must answer "yes" whether the pesimilar person. If the answer to questives. If the private fund uses more that uses. If the private fund uses more that the perivate fund uses more that the private fund uses. If the private fund uses more that the perivate fund uses more that the private fund uses more that the private fund identification number: (include the "805-" prefix also) 805-8477578591	I for purposes of investor subsets of such person. of someone other than you of erson acts as a placement age on 28.(a) is "yes," respond to an one marketer you must con No In	r your <i>employees</i> for marketing purposes? nt, consultant, finder, introducer, municipal advaces (b) through (g) below for each such applete questions (b) through (g) separately for	Yes visor or other solicitor, or marketer the private func
	ete a) wat	vant quotes, and (ii) the valuation used actions) was the valuation determined leads on the private fund use the services. You must answer "yes" whether the pesimilar person. If the answer to questives. If the private fund uses more that uses. If the private fund uses more that the perivate fund uses more that the private fund: AEON GLOBAL EQUITY SHAREHOLDER Private fund identification number: (include the "805-" prefix also) 805-8477578591	of someone other than you of some as a placement age on 28.(a) is "yes," respond to an one marketer you must con No In	r your <i>employees</i> for marketing purposes? nt, consultant, finder, introducer, municipal advaces (b) through (g) below for each such applete questions (b) through (g) separately for	Yes visor or other solicitor, or marketer the private func
a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	ete a) WAT a) b)	vant quotes, and (ii) the valuation used cations) was the valuation determined leads on the private fund use the services. You must answer "yes" whether the pesimilar person. If the answer to questives. If the private fund uses more the uses. If the private fund uses more that the private fund is services. Whether the pesimilar person is the private fund uses more that uses. If the private fund uses more that uses. If the private fund is services. AEON GLOBAL EQUITY SHAREHOLDER Private fund identification number: (include the "805-" prefix also) 805-8477578591	of someone other than you of some acts as a placement age on 28.(a) is "yes," respond to an one marketer you must come marketer you must come marketer you must come of the someone of the someone other than you of the someone other t	r your <i>employees</i> for marketing purposes? nt, consultant, finder, introducer, municipal adv questions (b) through (g) below for each such inplete questions (b) through (g) separately for formation Filed	Yes visor or other solicitor, or marketer the private func

	(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.						
٥.	No Information Filed						
		Yes	No				
6.	(a) Is this a "master fund" in a master-feeder arrangement?	0	•				
	(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 <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> :						
	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:	or ead	ch				
	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 i multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	ssued					
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes					
	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 regardless of whether they are also <i>private funds</i> or registered investment companies.	C vehicl	⊙ es,				
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	O				
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 O	No ⊙				
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 privations of the private of	ate fu	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> : \$ 15,187,461						
Ow	<u>vnership</u>						

12. Minimum investment commitment required of an investor in the *private fund*:

	NOT	000,000 E: 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 nizational documents of the fund).	е	
13.	Appi 3	roximate number of the <i>private fund's</i> beneficial owners:		
14.	Wha	t 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:		
		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	
16.	Wha	t is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
Yo	ur Ad	visory Services		
			Yes	No
17.		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.	r to	
		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	O	or
		to question 18.(a) is "no," leave this question blank.	unsv	Ci
		No Information Filed		
10			Yes	No
19.		your <i>clients</i> solicited to invest in the <i>private fund?</i> E: For purposes of this question, do not consider feeder funds of the private fund.	⊙	0
	NOT	E. For purposes of this question, do not consider reeder rands of the private rand.		
20.	Appı 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Pri	vate	Offering.		
			Yes	No
21.	Has	the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
22.	If ye	s, provide the <i>private fund's</i> Form D file number (if any):		
	1 41	m D file number		
	021	-199903		
B. S	ERVIO	CE PROVIDERS		
Au	ditors	i e e e e e e e e e e e e e e e e e e e		
			Yes	No
23.		 Are the private fund's financial statements subject to an annual audit? If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? 	⊙ ⊙	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.	~	
		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: ERNST & YOUNG					
	(c)	The location of the auditing	, firm's office responsible for the	private fund's audit (city, state and country	۸۰		
		City:	State:	Country:	·)·		
		NEW YORK	New York	United States			
	(d)	Is the auditing firm an inde	pendent public accountant?			Yes ⊙	No C
	(e)	Is the auditing firm registe	red with the Public Company Acc	ounting Oversight Board?		•	0
		If yes, Public Company Acc	ounting Oversight Board-Assigne	d Number:			
	(f)	If "yes" to (e) above, is the accordance with its rules?	auditing firm subject to regular	nspection by the Public Company Accounti	ng Oversight Board in	•	c
						Υe	s No
(g)) Are the invest		ancial statements for the most re	cently completed fiscal year distributed to	the <i>private fund's</i>	•	0
(h)				und since your last annual updating amend	dment contain unqualifie	d opir	nions?
		•		amendment to your Form ADV to update y	rour response when the r	report	: is
Prime	Broker	:					
24. (a)	Does	the <i>private fund</i> use one or	more prime brokers?			Ye	s No
(*)	If the	answer to question 24.(a) i	s "yes," respond to questions (b)	through (e) below for each prime broker t ns (b) through (e) separately for each prin	•	-	
			No 3	nformation Filed			
Custod	<u>lian</u>					Υe	s No
25. (a)	Does	the <i>private fund</i> use any cu	stodians (including the prime bro	kers listed above) to hold some or all of its	assets?	G	0
			, , , , , , , , , , , , , , , , , , , ,	through (g) below for each custodian the μ (b) through (g) separately for each custod		priva	te
	Addi	tional Custodian Informa	tion: 1 Record(s) Filed.				
				o) through g) below for each custodian the is (b) through (g) separately for each custo	•	e priv	ate
	(b)	Legal name of custodian: STATE STREET BANK & TRI	JST				
	(c)	Primary business name of o					
	(d)	The location of the custodia City: BOSTON	an's office responsible for <i>custod</i> State: Massachusetts	of the <i>private fund's</i> assets (city, state an Country: United States	d country):		
	(e)	Is the custodian a <i>related</i> μ	person of your firm?			Yes	No ⊙
	(f)	If the custodian is a broker	-dealer, provide its SEC registrat	on number (if any):			

	- CRD Number (if a	any):		
	(g) If the custodian i identifier (if any)		out does not have an SEC registration number, provid	e its <i>legal entity</i>
Admin	<u>istrator</u>			Yes No
26. (a) Does the <i>private fund</i> u	se an administrator other than your firm?		• o
	·	on 26.(a) is "yes," respond to questions (b) as (b) through (f) separately for each admin	through (f) below. If the <i>private fund</i> uses more than istrator.	one administrator, you
	Additional Administr	ator Information : 1 Record(s) Filed.		
	11	tion 26.(a) is "yes," respond to questions (t ust complete questions (b) through (f) sepa	o) through (f) below. If the <i>private fund</i> uses more the rately for each administrator.	an one
	(b) Name of adminis			
	(c) Location of admir	nistrator (city, state and country):		
	City: BOSTON	State: Massachusetts	Country: United States	
	(d) Is the administra	tor a <i>related person</i> of your firm?		Yes No ○ ⊙
		strator prepare and send investor account st	atements to the <i>private fund's</i> investors? but not all investors) ONo (provided to no investors	,
	• Yes (provided	to all investors) Some (provided to some	but not all investors) No (provided to no investors	5)
	` '		s the investor account statements to the (rest of the) (rest of the) private fund's investors, respond "not a	•
yo 10 In re	ur <i>related person</i> ? 0% Clude only those assets w evant quotes, and (ii) the	here (i) such <i>person</i> carried out the valuatio	s (by value) was valued by a <i>person</i> , such as an adm on procedure established for that asset, if any, including scriptions, redemptions or distributions, and fee calcu	ng obtaining any
Marke	<u>ters</u>			Yes No
28. (a) Does the <i>private fund</i> u	se the services of someone other than you	or your <i>employees</i> for marketing purposes?	0 0
	similar person. If the ar	nswer to question 28.(a) is "yes," respond to	ent, consultant, finder, introducer, municipal advisor on questions (b) through (g) below for each such mark omplete questions (b) through (g) separately for each	eter the <i>private fund</i>
		No Ir	nformation 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.

Pro	priet	tary Interest in <i>Client</i> Transactions		
Α.	Do y	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)?	\odot	0
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	•	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))?	0	0
Sal	es In	nterest in <i>Client</i> Transactions		
В.	Do y	you or any related person:	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory client securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	⊚
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	•	0
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	•	0
Inv	estm	nent or Brokerage Discretion		
C.	Do y	you or any <i>related person</i> have <i>discretionary authority</i> to determine the:	Yes	No
	(1)	securities to be bought or sold for a <i>client's</i> account?	⊙	\circ
	(2)	amount of securities to be bought or sold for a <i>client's</i> account?	\odot	\circ
	(3)	broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?	⊚	\circ
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	•	О
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	•	0
Ε.	Do y	you or any related person recommend brokers or dealers to clients?	•	0
F.	If yo	ou answer "yes" to E. above, are any of the brokers or dealers related persons?	•	0
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 third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	⊙	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 services" under section 28(e) of the Securities Exchange Act of 1934?	•	0
Н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	•	0
	(2)	Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)?	0	О
I.		you or any related person, including any employee, directly or indirectly, receive compensation from any person (other than you or any ted person) for client referrals?	О	•
	In y	our response to Item 8.I., do not include the regular salary you pay to an employee.		
	rece	esponding 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 eived 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 of client referrals.	-	or

		em, we ask you whether you or a <i>related person</i> h ent Company Act of 1940) assets and about your c	has <i>custody</i> of <i>client</i> (other than <i>clients</i> that are investment companies registered under the custodial practices.	Э			
Α.	(1)	Do you have <i>custody</i> of any advisory <i>clients'</i> :		Yes	No		
		(a) cash or bank accounts?		\odot	0		
		(b) securities?		⊙	0		
	advi clier	isory fees directly from your clients' accounts, or (wer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your (ii) a related person has custody of client assets in connection with advisory services you pr you are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from	ovid	e to		
	(2)	If you checked "yes" to Item 9.A.(1)(a) or (b), we you have <i>custody</i> :	what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> fo	r wh	ich		
		U.S. Dollar Amount Tota	tal Number of <i>Clients</i>				
		(a) \$ 69,856,270 (b)) 2				
	do r	not include the amount of those assets and the nu	you have custody solely because you deduct your advisory fees directly from your clients' a umber of those clients in your response to Item 9.A.(2). If your related person has custody of the deto clients, do not include the amount of those assets and number of those clients in your in your response to Item 9.B.(2).	of cli			
В.	(1)		e to clients, do any of your related persons have custody of any of your advisory clients':	Yes	No		
		(a) cash or bank accounts?		⊙	\circ		
		(b) securities?		⊚	0		
	You	are required to answer this item regardless of how	ow you answered Item 9.A.(1)(a) or (b).				
	(2)	If you checked "yes" to Item 9.B.(1)(a) or (b), we your <i>related persons</i> have <i>custody</i> :	what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for	r wh	ich		
		U.S. Dollar Amount Tota	tal Number of <i>Clients</i>				
		(a) \$ 1,581,423,009 (b)) 297				
C.		ou or your related persons have custody of client forwing that apply:	funds or securities in connection with advisory services you provide to <i>clients</i> , check all the				
	٠,	 (1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage. (2) An independent public accountant audits annually the pooled investment vehicle(s) that you manage and the audited financial statements 					
	(2)	are distributed to the investors in the pools.					
	(4)	are qualified custodians for <i>client</i> funds and secu					
	prep	pare an internal control report. (If you checked Ite	ection 9.C. of Schedule D the accountants that are engaged to perform the audit or examinalem 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you affunds you advise in Section 7.B.(1) of Schedule D).				
D.	Doy	ou or your related person(s) act as qualified cust	todians for your clients in connection with advisory services you provide to clients?	Yes	No		
	(1)	you act as a qualified custodian		\circ	\odot		
	(2)	your related person(s) act as qualified custodian	n(s)	\odot	0		
	206		ons that act as qualified custodians (other than any mutual fund transfer agent pursuant to Schedule D, regardless of whether you have determined the related person to be operation				
E.		ou are filing your annual updating amendment and year, provide the date (MM/YYYY) the examinati	d you were subject to a surprise examination by an <i>independent public accountant</i> during y ion commenced:	our l	ast		
F.		ou or your <i>related persons</i> have <i>custody</i> of <i>client</i> f as qualified custodians for your <i>clients</i> in connection	funds or securities, how many <i>persons</i> , including, but not limited to, you and your <i>related p</i> ion with advisory services you provide to <i>clients?</i>	erso	ns,		

Item 9 Custody

SF	CTION	9.C. 1	Indenende	nt 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.

Yes No

A. Does any person not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, control your management or policies?

 \circ

If yes, complete Section 10.A. of Schedule D.

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

- 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 provide the following information (you must complete a separate Schedule D Section 10.B. for each public reporting company):
 - (1) Full legal name of the public reporting company:

THE TORONTO-DOMINION BANK

(2) The public reporting company's CIK number (Central Index Key number that the SEC assigns to each reporting 947263 company):

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.

Do	any of the events below involve you or any of your supervised persons?	Yes ⊙	No C
	"yes" answers to the following questions, complete a Criminal Action DRP:		-
	In the past ten years, have you or any <i>advisory affiliate</i> :	Yes	No
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any <i>felony</i> ?	•	0
	(2) been charged with any felony?	⊚	0
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item to charges that are currently pending.	!1.A.(.	2)
В.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	О	•
	(2) been charged with a misdemeanor listed in Item 11.B.(1)?	0	•
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 2 to charges that are currently pending.	!1.B.(2	2)
For	"yes" answers to the following questions, complete a Regulatory Action DRP:		
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	No
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	•
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	⊙	0
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	\odot	0
	(5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity?	•	0
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:		
	(1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical?	0	•
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	•	0
	(3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related activity?	•	0
	(5) ever denied, suspended, or revoked your or any advisory affiliate's registration or license, or otherwise prevented you or any advisory affiliate, by order, from associating with an investment-related business or restricted your or any advisory affiliate's activity?	О	•
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	•
	(2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	•	0
	(3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•

	(4) disciplined you or any 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	•
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:		
<u>For</u> H.		Yes	No
		Yes O	No ⊙
	(1) Has any domestic or foreign court:	_	_
	(1) Has any domestic or foreign court: (a) in the past ten years, <i>enjoined</i> you or any <i>advisory affiliate</i> in connection with any <i>investment-related</i> activity?	_	•

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
If "	yes," you do not need to answer Items 12.B. and 12.C.		
В.	Do you:		
	(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) controlled by or under common control with 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

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		CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
BARNETT, DAVID, ANDREW	I	CHIEF COMPLIANCE OFFICER	12/2010	NA	Υ	N	2323454
TD BANK US HOLDING COMPANY	DE	SHAREHOLDER	11/2013	E	Υ	N	01-0437984
BOOTH, WILLIAM, JAMES	I	CHIEF INVESTMENT OFFICER	01/2025	NA	Y	N	4593543
COOPER, BRUCE	I	CHIEF EXECUTIVE OFFICER	10/2022	NA	Y	N	6609064
SHARKEY, MARYANNE	I	CHIEF FINANCIAL OFFICER	01/2025	NA	Y	N	8031699

Schedule B

Indirect Owners

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

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

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

FULL LEGAL NAME	DE/FE/I	Entity in Which	Status	Date Status	Ownership	Control	PR	CRD No. If None: S.S. No. and
(Individuals: Last Name, First		Interest is		Acquired	Code	Person		Date of Birth, IRS Tax No. or
Name, Middle Name)		Owned		MM/YYYY				Employer ID No.
THE TORONTO-DOMINION BANK	FE	TD GROUP US	DIRECT	03/2013	E	Υ	Υ	13-5640479
		HOLDINGS LLC	OWNER					
TD GROUP US HOLDINGS LLC	DE	TD BANK US	DIRECT	07/2015	E	Υ	N	47-4435262
		HOLDING	OWNER					
		COMPANY						

Schedule D - Miscellaneous

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

Consistent with Instructions for the Part 1A of Form ADV, the total regulatory assets under management in item 5.F does not include certain assets in Unified Managed Accounts ("UMAS") for which TD Epoch does not "provide continuous and regular supervisory or management services" of the underling UMA clients. TD Epoch does however include certain assets in item 5.F for those UMAS for which TD Epoch is responsible for placing transactions for the underlying UMA accounts and has included these underlying UMA clients (and not the plan sponsors) even though TD Epoch does not have any direct relationships with these underlying UMA clients. These clients are categorized as high net worth. The total assets under management in all wrap accounts are included in TD Epoch's total assets under management in item 5.F. The number of clients in item 5.D and 5.F reflect the number of individual wrap fee accounts. With respect to item 5.F, TD Epoch considers each strategy maintained with the wrap fee sponsor to be an account. While the AEON Global Absolute Return Fund, LLC meets the technical definition of a Hedge Fund, it does not engage in short selling or leveraging. Separately managed accounts may hold small concentrations in cash and cash equivalents for liquidity management purposes, however cash holdings are not reflected in 5.K.(1) since they are not utilized for investment exposure purposes in TD Epoch strategies. With respect to Item 7. A of Schedule D, Financial Industry Affiliates, we list the Affiliates that we have business relationships with and/or those we may have a conflict of interest with. A supplementary list of related persons is available upon request. Certain client accounts of TD Epoch are managed and supported by employees of an affiliate, TD Asset Management Inc. These employees, who perform investment advisory services to TD Epoch clients, are deemed TD Epoch employees and subject to the supervision and oversight by TD Epoch based on guidance from the SEC Staff.

Schedule R	
	No Information Filed
	No Illiottilation Fried

DRP	Pages							
CRII	MINAL DISCLO	SURE REPORTIN	IG PAGE (ADV)					
				GENERAL	INSTRUCTIONS			
	Disclosure Reposition of Form ADV.	orting Page (DRP /	ADV) is an C INITIA	L OR	ED response used t	to report details for aff	irmative responses to Items	11.A. or
				(Criminal			
	ck item(s) being	g responded to:	7 44 440)		-		T 44 B(0)	
Y	11.A(1)		☑ 11.A(2)		□ 11.B(1)		□ 11.B(2)	
	a separate DRP a completed Ex		proceeding . The san	me event or <i>proc</i>	eeding may be repo	orted for more than on	ne <i>person</i> or entity using one	e DRP. File
case	es arising out of	the same event, r		separate DRPs. U			criminal actions, including sout of the same event. One o	
PAR	ΤΙ							
A.	The person(s)	or entity(ies) for	whom this DRP is bei	ing filed is (are):				
	C You (the a	dvisory firm)						
	C You and or	ne or more of your	advisory affiliates					
	One or mo	re of your <i>advisor</i>	y affiliates					
	name).	_			•	ate below (for individual)	als, Last name, First name, l	Middle
	ADV DRP - ADVISORY AFFILIATE							
	CRD The state of t							
	Number:		This ad	dvisory affiliate is	o a Firm Can	Individual		
	Registered:	C Yes ⊙ No						
	Name:	TD BANK U.S. HO						
		COMPANY (TDBU (For individuals,	,					
		Middle)	. ,					
	☐ This DRP s registered adviser's o	hould be removed or applying for reg or advisory affiliate hould be removed	from the ADV record gistration with the SE 's favor.	d because: (1) th EC or reporting as	e event or <i>proceed</i> s an <i>exempt reporti</i>	ing adviser with the SE	with the adviser. n ten years ago or (2) the a EC and the event was resolve data-entry mistake. Explain	ed in the
В.	-	_	ered through the IARE t? If the answer is "Y	-		•	ted a DRP (with Form ADV,	BD or U-4)
	C Yes ⊙	No						
	NOTE: The co	mpletion of this fo	rm does not relieve tl	he <i>advisory affili</i> d	ate of its obligation	to update its IARD or	CRD records.	
PAR	If charge(s) w the organization	on was an <i>investm</i>	-	and your or the	advisory affiliate's	exercise(d) control: Eposition, title, or relati	Enter organization name, wh onship.	ether or not
2.	Formal Charge Docket/Case r	` '	in: (include name of	Federal, Military,	State or Foreign C	ourt, Location of Court	: - City or County <u>and</u> State	or Country,
	U.S. DISTRICT	COURT FOR THE	DISTRICT OF NEW JE	ERSEY LOCATED	IN NEWARK, NEW	JERSEY. (CRIM. NO. 24	1-668)	
3.	Event Disclosu	re Detail (Use this	s for both organization	nal and individua	al charges.)			

	A. Date First Charged (MM/DD/YYYY):								
		10/10/2024 © Exact C Expla	nation						
	В.	If not exact, provide explanation: Event Disclosure Detail (include C	narge(s)/Charge Description(s), and	d for each charge provide: (1) nur	nber of counts, (2) <i>felony</i> or				
	misdemeanor, (3) plea for each charge, and (4) product type if charge is investment-related). ON OCTOBER 10, 2024, THE U.S. DEPARTMENT OF JUSTICE, CRIMINAL DIVISION, MONEY LAUNDERING AND ASSET RECOVERY SECTION ("MLARS") AND THE UNITED STATES ATTORNEY'S OFFICE FOR THE DISTRICT OF NEW JERSEY ("THE USAO-DNJ") FILED A CRIMINAL INFORMATION IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY (THE "DISTRICT COURT") CHARGING TDBUSH WITH ONE COUNT OF FAILING TO MAINTAIN AN ADEQUATE AML PROGRAM IN VIOLATION OF TITLE 31, UNITED STATES CODE, SECTIONS 5318(H) AND 5322 AND ONE COUNT OF FAILING TO FILE ACCURATE CTRS IN VIOLATION OF TITLE 31, UNITED STATES CODE, SECTIONS 531 AND 5324. ALL CHARGES ARE FELONIES.								
	C.	Did any of the Charge(s) within th	e Event involve a felony? • Yes	C No					
				- NO					
		Current status of the Event?	- ''						
	E.	Event Status Date (complete unle	=):					
		10/10/2024 © Exact C Expla If not exact, provide explanation:	nation						
4.		position Disclosure Detail: ude for each charge (a) Disposition	Type (a.g. convicted acquitted di	smissed protrial etc.) (b) Date	(c) Sontonco/Ponalty (d) Duration	(if			
	sent TDB	tence - suspension, probation, etc.) BUSH ENTERED A GUILTY PLEA FOR TES CODE, SECTIONS 5318(H) ANI	, (e) Start Date of Penalty, (f) Pena ONE COUNT OF FAILING TO MAINT	lty/Fine Amount, and (g) Date Pai TAIN AN ADEQUATE AML PROGRAM	d. 1 IN VIOLATION OF TITLE 31, UNIT	` ED			
	OW	DE, SECTIONS 5313 AND 5324. TDI NED SUBSIDIARY TD BANK, N.A. (" L ON NOVEMBER 7, 2024	USH MADE AN ADMISSION OF GUI	ILT TO THE DISTRICT COURT AND	WILL PAY, TOGETHER WITH ITS W	HOLLY			
5.	the	vide a brief summary of circumstan subject of the charge(s) occurred. EDOJ ALLEGED THAT BETWEEN JAN	Your response must fit within the s	pace provided.)					
	TDB	BNA, FAILED TO IMPLEMENT AN AM PROGRAM, INCLUDING (A) FAILIN	PROGRAM THAT COMPLIED WITH	THE BSA, AND AS A RESULT, FAIL	ED TO REMEDIATE DEFICIENCIES	IN THE			
	(B) FAILING TO ADEQUATELY TRAIN ITS AML AND RETAIL EMPLOYEES. THESE FAILURES ENABLED, AMONG OTHER THINGS, THREE MONEY LAUNDERING NETWORKS TO LAUNDER OVER \$600 MILLION IN CRIMINAL PROCEEDS THROUGH TDBNA BETWEEN 2019 AND 2023. THE DOJ FURTHER ALLEGED THAT TDBNA'S SENIOR AML EXECUTIVES KNEW THERE WERE DEFICIENCIES IN THE ENTITIES' U.S. AML POLICIES, PROCEDURES, AND CONTROLS. IN ADDITION, DURING THE RELEVANT PERIOD, TDBNA OMITTED ALMOST ALL DOMESTIC AUTOMATED CLEARINGHOUSE TRANSACTIONS, MOST CHECK ACTIVITY, AND NUMEROUS OTHER TRANSACTION TYPES FROM MONITORING BY ITS AUTOMATED TRANSACTION MONITORING SYSTEM. DUE TO THIS FAILURE, TDBNA DID NOT MONITOR APPROXIMATELY \$18.3 TRILLION IN ACTIVITY BETWEEN JANUARY 1, 2018, THROUGH APRIL 12, 2024. NEITHER EPOCH NOR ITS EMPLOYEES WERE INVOLVED IN THE UNDERLYING CONDUCT AT ISSUE NOR DID THIS MATTER INVOLVE THE PROVISION OF INVESTMENT ADVISORY SERVICES BY EPOCH OR ITS EMPLOYEES.								
REG	ULAT	ORY ACTION DISCLOSURE REP	ORTING PAGE (ADV)						
			GENERAL INS	TRUCTIONS					
		osure Reporting Page (DRP ADV) is .E., 11.F. or 11.G. of Form ADV.	an [©] INITIAL OR [©] AMENDED r	esponse used to report details for	affirmative responses to Items 11.	C.,			
			Regulator	y Action					
		m(s) being responded to:	_		_				
	11.C(,	☐ 11.C(3)	□ 11.C(4)	☐ 11.C(5)				
	L1.D(☐ 11.D(3)	□ 11.D(4)	□ 11.D(5)				
	L1.E(□ 11.E(3)	□ 11.E(4)					
	l 1.F.	□ 11.G.							
		parate DRP for each event or <i>procee</i> mpleted Execution Page.	ding . The same event or proceedin	ng may be reported for more than	one <i>person</i> or entity using one DR	P. File			
		t may result in more than one affirent. If an event gives rise to actions		•	-	the			
PAR	ΓĮ								
A.		person(s) or entity(ies) for whom	his DRP is being filed is (are):						
	You (the advisory firm)								
	164 (416 44166), 11111)								

	C You and one or more of your advisory affiliates							
	• One or more of your advisory affiliates							
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name).							
	If the <i>advisory</i>	affiliate has a CRD nun	nber, provide that number. If not, indicate "non-registered" by checking the appropriate box.					
	ADV DRP - ADVISORY AFFILIATE							
	CRD Number:	164484	This <i>advisory affiliate</i> is ⊙ a Firm O an Individual					
	Registered:	⊙ Yes						
	Name:	TD PRIVATE CLIENT W	EALTH					
		(For individuals, Last, Middle)	First,					
	☐ This DRP sl registered	hould be removed from	the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is ion with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the or.					
	11.D(4), and	only if that event occurr	th a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item red more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any more than ten years ago.					
	☐ This DRP sl circumstan		the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the					
В.	If the <i>advisory affiliate</i> is registered through the IARD system or <i>CRD</i> system, has the <i>advisory affiliate</i> submitted a DRP (with Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the event? If the answer is "Yes," no other information on this DRP must be provided.							
	⊙ Yes C	No						
	NOTE: The cor	mpletion of this form do	es not relieve the <i>advisory affiliate</i> of its obligation to update its IARD or <i>CRD</i> records.					
PAR								
1.	,	ion initiated by: her Federal State	0 000 05 :					
			ial regulatory authority, federal, state, or SRO)					
2.	Principal Sanct	cion:						
	Other Sanction	ns:						
3.	Date Initiated	(MM/DD/YYYY):						
	C Exact C If not exact, pr	Explanation rovide explanation:						
4.	Docket/Case N	lumber:						
5.	Advisory Affilia	ate Employing Firm whe	n activity occurred which led to the regulatory action (if applicable):					
6.	Principal Produ	ict Type:						
	Other Product	Types:						
7.	Describe the a	llegations related to this	s regulatory action (your response must fit within the space provided):					
8.	Current Status	? C Pending C	On Appeal C Final					
9.	If on appeal, re	egulatory action appeal	ed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:					

F

☐ Monetary/Fine A ☐ Revocation/Expu ☐ Censure ☐ Bar B. Other Sanctions Order Sanction detail: if surfinancial Operations requalify/retrain, typedisgorgement or monof penalty was waive	on snation: owing Sanctions Order amount: \$ ulsion/Denial dered: uspended, enjoined or Principal, etc.). If requestion of exam required an entary compensation, ed: of details related to the	barred, provide duration includ qualification by exam/retraining nd whether condition has been provide total amount, portion	☐ Disgorgement/Restitution ☐ Cease and Desist/Injunction ☐ Suspension In Suspension In Start date and capacities af was a condition of the sanction satisfied. If disposition resulted levied against you or an advisor.	ffected (General Securities Principal, n, provide length of time given to
C Exact C Explanation If not exact, provide explain 12. Resolution Detail: A. Were any of the folloo Monetary/Fine A Revocation/Expu Censure Bar B. Other Sanctions Order Sanction detail: if su Financial Operations requalify/retrain, typ disgorgement or mone of penalty was waive	on anation: owing Sanctions Order amount: \$ ulsion/Denial ered: aspended, enjoined or Principal, etc.). If receive of exam required and anetary compensation, ed: of details related to the	barred, provide duration incluo qualification by exam/retraining nd whether condition has been provide total amount, portion	☐ Disgorgement/Restitution ☐ Cease and Desist/Injunction ☐ Suspension In Suspension In Start date and capacities af was a condition of the sanction satisfied. If disposition resulted levied against you or an advisor.	fected (General Securities Principal, n, provide length of time given to l in a fine, penalty, restitution, ry affiliate, date paid and if any portior
If not exact, provide explain. A. Were any of the followard Monetary/Fine Arevocation/Expure Bar B. Other Sanctions Order Sanction detail: if surfinancial Operations requalify/retrain, type disgorgement or more of penalty was waive	enation: powing Sanctions Order amount: \$ ulsion/Denial dered: uspended, enjoined or Principal, etc.). If recome of exam required an enetary compensation, ed: of details related to the	barred, provide duration incluo qualification by exam/retraining nd whether condition has been provide total amount, portion	☐ Disgorgement/Restitution ☐ Cease and Desist/Injunction ☐ Suspension In Suspension In Start date and capacities af was a condition of the sanction satisfied. If disposition resulted levied against you or an advisor.	fected (General Securities Principal, n, provide length of time given to l in a fine, penalty, restitution, ry affiliate, date paid and if any portior
12. Resolution Detail: A. Were any of the follo Monetary/Fine A Revocation/Expu Censure Bar B. Other Sanctions Orde Sanction detail: if su Financial Operations requalify/retrain, typ disgorgement or mon of penalty was waive	owing Sanctions Order amount: \$ alsion/Denial ered: aspended, enjoined or Principal, etc.). If recover of exam required an anetary compensation, ed: of details related to the	barred, provide duration incluo qualification by exam/retraining nd whether condition has been provide total amount, portion	☐ Disgorgement/Restitution ☐ Cease and Desist/Injunction ☐ Suspension In Suspension In Start date and capacities af was a condition of the sanction satisfied. If disposition resulted levied against you or an advisor.	fected (General Securities Principal, n, provide length of time given to l in a fine, penalty, restitution, ry affiliate, date paid and if any portior
A. Were any of the follo Monetary/Fine A Revocation/Expu Censure Bar B. Other Sanctions Ord Sanction detail: if su Financial Operations requalify/retrain, typ disgorgement or moi of penalty was waive	amount: \$ Ilsion/Denial Iered: Ispended, enjoined or Principal, etc.). If recover of exam required an enetary compensation, ed: of details related to the	barred, provide duration incluo qualification by exam/retraining nd whether condition has been provide total amount, portion	☐ Disgorgement/Restitution ☐ Cease and Desist/Injunction ☐ Suspension In Suspension In Start date and capacities af was a condition of the sanction satisfied. If disposition resulted levied against you or an advisor.	fected (General Securities Principal, n, provide length of time given to l in a fine, penalty, restitution, ry affiliate, date paid and if any portior
☐ Monetary/Fine A ☐ Revocation/Expu ☐ Censure ☐ Bar B. Other Sanctions Order Sanction detail: if surfinancial Operations requalify/retrain, typedisgorgement or more of penalty was waived. 13. Provide a brief summary of	amount: \$ Ilsion/Denial Iered: Ispended, enjoined or Principal, etc.). If recover of exam required an enetary compensation, ed: of details related to the	barred, provide duration incluo qualification by exam/retraining nd whether condition has been provide total amount, portion	☐ Disgorgement/Restitution ☐ Cease and Desist/Injunction ☐ Suspension In Suspension In Start date and capacities af was a condition of the sanction satisfied. If disposition resulted levied against you or an advisor.	fected (General Securities Principal, n, provide length of time given to l in a fine, penalty, restitution, ry affiliate, date paid and if any portior
Revocation/Expu	llsion/Denial lered: Ispended, enjoined or Principal, etc.). If reque of exam required an entary compensation, ed: of details related to the	barred, provide duration includ qualification by exam/retraining nd whether condition has been provide total amount, portion	☐ Cease and Desist/Injunction ☐ Suspension ling start date and capacities af was a condition of the sanction satisfied. If disposition resulted levied against you or an advisor	fected (General Securities Principal, n, provide length of time given to l in a fine, penalty, restitution, ry affiliate, date paid and if any portior
Censure Bar B. Other Sanctions Orde Sanction detail: if su Financial Operations requalify/retrain, typ disgorgement or motor of penalty was waive	ered: Ispended, enjoined or Principal, etc.). If recome of exam required and the interpolation, ed: If details related to the interpolation is a second to the int	barred, provide duration includ qualification by exam/retraining nd whether condition has been provide total amount, portion	☐ Cease and Desist/Injunction ☐ Suspension ling start date and capacities af was a condition of the sanction satisfied. If disposition resulted levied against you or an advisor	fected (General Securities Principal, n, provide length of time given to l in a fine, penalty, restitution, ry affiliate, date paid and if any portior
Bar B. Other Sanctions Order Sanction detail: if sure Financial Operations requalify/retrain, type disgorgement or more of penalty was waive to the summary of the summar	ispended, enjoined or Principal, etc.). If reques of exam required an entary compensation, ed:	barred, provide duration includ qualification by exam/retraining nd whether condition has been provide total amount, portion	Suspension ling start date and capacities af was a condition of the sanctior satisfied. If disposition resulted levied against you or an advisor	fected (General Securities Principal, n, provide length of time given to l in a fine, penalty, restitution, ry affiliate, date paid and if any portior
B. Other Sanctions Order Sanction detail: if sure Financial Operations requalify/retrain, type disgorgement or more of penalty was waive 13. Provide a brief summary of the sanctions of the summary of the sanctions of the sanct	ispended, enjoined or Principal, etc.). If reques of exam required an entary compensation, ed:	barred, provide duration includ qualification by exam/retraining nd whether condition has been provide total amount, portion	ling start date and capacities af was a condition of the sanctior satisfied. If disposition resulted levied against you or an <i>adviso</i> .	n, provide length of time given to I in a fine, penalty, restitution, ry affiliate, date paid and if any portion
Sanction detail: if su Financial Operations requalify/retrain, typ disgorgement or mo of penalty was waive	ispended, enjoined or Principal, etc.). If reques of exam required an entary compensation, ed:	qualification by exam/retraining nd whether condition has been provide total amount, portion	was a condition of the sanction satisfied. If disposition resulted levied against you or an <i>adviso</i> .	n, provide length of time given to I in a fine, penalty, restitution, ry affiliate, date paid and if any portion
Financial Operations requalify/retrain, typ disgorgement or moi of penalty was waive	Principal, etc.). If recover of exam required an entary compensation, ed:	qualification by exam/retraining nd whether condition has been provide total amount, portion	was a condition of the sanction satisfied. If disposition resulted levied against you or an <i>adviso</i> .	n, provide length of time given to I in a fine, penalty, restitution, ry affiliate, date paid and if any portion
	_	GENERAL INSTRU		
his Disclosure Reporting Page (1.D., 11.E., 11.F. or 11.G. of Fo	•	NITIAL OR 🧐 AMENDED respo	nse used to report details for a	ffirmative responses to Items 11.C.,
heck item(s) being responded	to:	Regulatory Ac	cion	
` '	☑ 11.C(2)	☐ 11.C(3)	□ 11.C(4)	☑ 11.C(5)
,	☐ 11.D(2)	☐ 11.D(3)	□ 11.D(4)	□ 11.D(5)
	□ 11.E(2) □ 11.G.	□ 11.E(3)	□ 11.E(4)	
∃11.F.	∟ 11.G.			
vith a completed Execution Pag	han one affirmative a	nswer to Items 11.C., 11.D., 1		ne <i>person</i> or entity using one DRP. File DRP to report details related to the ate DRP.
ART I				
A. The <i>person(s)</i> or entity(ies	s) for whom this DRP	is being filed is (are):		
You (the advisory firm))			
C You and one or more o	of your <i>advisory affilia</i>	tes		
One or more of your ac	dvisory affiliates			
name).	,	-	isory affiliate below (for individue "non-registered" by checking	uals, Last name, First name, Middle the appropriate box.
ADV DRP - ADVISORY AF	FILIATE			
		No Information	on Filed	
			filiate(s) is no longer associated	with the adviser. an ten years ago or (2) the adviser is

	adviser's or advisory affiliate's favor.	
	If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP 11.D(4), and only if that event occurred more than ten years ago. If you are registered or re event listed in Item 11 that occurred more than ten years ago.	
	\square This DRP should be removed from the ADV record because it was filed in error, such as du circumstances:	e to a clerical or data-entry mistake. Explain the
В.	to the IARD or <i>CRD</i> for the event? If the answer is "Yes," no other information on this DRP m	
	C Yes C No	
	NOTE: The completion of this form does not relieve the <i>advisory affiliate</i> of its obligation to u	odate its IARD or <i>CRD</i> records.
PAR	PART II	
1.	Regulatory Action initiated by:	
2.	2. Principal Sanction: Cease and Desist	
	Other Sanctions: CENSURE CIVIL AND ADMINISTRATIVE PENALTIE(S)/FINE(S) UNDERTAKING	
3.	3. Date Initiated (MM/DD/YYYY):	
	08/14/2024	
4.	4. Docket/Case Number: AP 3-22008	
5.	5. Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if	applicable):
6.	6. Principal Product Type: No Product Other Product Types:	
7.	7. Describe the allegations related to this regulatory action (your response must fit within the specific to preserve OFF-CHANNEL BUSINESS RELATED COMMUNICATIONS; AND, FAILUR A VIEW TO PREVENTING THESE VIOLATIONS.	
8.	8. Current Status? C Pending C On Appeal G Final	
9.	9. If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appe	al Filed:
If F	If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.	
10.	10. How was matter resolved: Settled	
11.	11. Resolution Date (MM/DD/YYYY):	
	08/14/2024 © Exact © Explanation	
	If not exact, provide explanation:	
12.	12. Resolution Detail:	
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?	
	✓ Monetary/Fine Amount: \$ 30,000,000.00	
	Revocation/Expulsion/Denial Disgorgeme	
	▼ Censure ▼ Cease and ▼ Cease	Desist/Injunction

☐ Bar		☐ Suspension							
B. Other Sanctions <i>Ordered</i> :									
UNDERTAKINGS									
Sanction detail: if suspended, enjoined or l	parred, provide duration includ	ding start date and capacities af	fected (General Securities Principal,						
Financial Operations Principal, etc.). If requ	alification by exam/retraining	was a condition of the sanction	n, provide length of time given to						
requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution,									
disgorgement or monetary compensation, provide total amount, portion levied against you or an advisory affiliate, date paid and if any portion									
of penalty was waived:									
UNDERTAKINGS AS DESCRIBED IN THE SETTLED ADMINISTRATIVE ORDER, INCLUDING RETENTION OF AN INDEPENDENT COMPLIANCE									
CONSULTANT. WITH REGARD TO THE MONETARY/FINE AMOUNT RESPONSE IN ITEM 12.A ABOVE, THE AMOUNT IS IMPOSED JOINTLY AND SEVERALLY WITH TD SECURITIES USA LLC AND TD PRIVATE CLIENT WEALTH LLC. THE CIVIL MONETARY PENALTY WAS PAID ON AUGUST 21,									
2024.									
2024.	2024.								
13. Provide a brief summary of details related to the	action status and (or) disposi	ition and include relevant terms	, conditions and dates (your response						
must fit within the space provided).	ACD WILLIAM COLOND THAT TO	EDOCH TO CECUDITIES (UCA)	LLC (TD CECUDITIES) AND TO DRIVATE						
ON AUGUST 14, 2024, THE SEC ISSUED AN ORE CLIENT WEALTH LLC (TDPCW) (COLLECTIVELY T	•		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,						
BUSINESSES; AND, (2) FAILED TO REASONABLY									
SETTLEMENT WAS A PART OF THE SEC'S LONGS									
ADVISERS WERE PROPERLY RETAINING BUSINE									
ENTITIES ADMITTED TO THE FACTS IN THE SEC	S ORDER, ACKNOWLEDGED T	THAT ITS CONDUCT VIOLATED T	THE FEDERAL SECURITIES LAWS, AND						
AGREED TO: (1) CEASE AND DESIST FROM COM	MITTING OR CAUSING VIOLATION	TIONS OF THE RECORD RETENT	TION REQUIREMENTS IN THE FEDERAL						
SECURITIES LAW AND RULES; (2) BE CENSURE									
IN THIS REGARD, PURSUANT TO AN INTERNAL A									
THE TD ENTITIES AGREED THAT THE AMOUNT C WITH CERTAIN UNDERTAKINGS. IN ITS ORDER,									
AND ITS AFFILIATES.	THE SEC ACKNOWLEDGED IT	IL COOPERATION AND THE KEI	ILDIAL LITORIS TAKEN DI TO EFOCTI						
	GENERAL INSTRU	CTIONS							
This Disclosure Reporting Page (DRP ADV) is an C IN	ITIAL OR AMENDED respo	onse used to report details for a	ffirmative responses to Items 11.C.,						
11.D., 11.E., 11.F. or 11.G. of Form ADV.									
Charlestone (a) basina managada da	Regulatory Act	tion							
Check item(s) being responded to:	T 11 0(2)	-	F 44 C(5)						
□ 11.C(1) □ 11.C(2)	☐ 11.C(3)	□ 11.C(4)	☐ 11.C(5)						
☐ 11.D(1)	☐ 11.D(3)	☑ 11.D(4)	□ 11.D(5)						
□ 11.E(1) □ 11.E(2)	□ 11.E(3)	□ 11.E(4)							
□ 11.F. □ 11.G.									
lles a serverte DDD for each avent an averaging. The			DDD File						
Use a separate DRP for each event or <i>proceeding</i> . The with a completed Execution Page.	s same event or <i>proceeding</i> m	lay be reported for more than o	ne person or entity using one DRP. File						
With a completed Execution rage.									
One event may result in more than one affirmative an	swer to Items 11.C., 11.D., 11	I.E., 11.F. or 11.G. Use only one	DRP to report details related to the						
same event. If an event gives rise to actions by more	than one regulator, provide de	etails for each action on a separ	ate DRP.						
PART I									
A. The <i>person(s)</i> or entity(ies) for whom this DRP is	s being filed is (are):								
C You (the advisory firm)									
You and one or more of your <i>advisory affiliat</i> .	05								
, , ,	±5								
⊙ One or more of your <i>advisory affiliates</i>									
If this DDD is being filed for	give the full server CU	icom offiliate belevit (C. 1. 1. 1. 1.	vole Leet name Circle and Mills						
If this DRP is being filed for an advisory affiliate, name).	give the full name of the advi	<i>isory arrillate</i> below (for individu	uais, Last name, First name, Middle						
,	de that number. If not, indicat	e "non-registered" by checking	the appropriate box.						
and davisory drimate has a site manage, pro-	If the advisory affiliate has a CRD number, provide that number. If not, indicate "non-registered" by checking the appropriate box.								
ADV DRP - ADVISORY AFFILIATE									
CRD	is <i>advisory affiliate</i> is [©] a Fir	m C on Individual							
Number:	is <i>auvisory amiliat</i> e is ≃ a Fir	III 🕶 an Individual							
Registered: O Yes									
Name: TD GROUP U.S. HOLDINGS,									
LLC (TDGUS)									
LEC (15003)									

	Middle)
CRD	
Number:	This advisory affiliate is $oldsymbol{\circ}$ a Firm $oldsymbol{\circ}$ an Individual
Registered:	
	C Yes
Name:	TD BANK U.S. HOLDING
	COMPANY (TDBUSH) (For individuals, Last, First,
	Middle)
CRD	This <i>advisory affiliate</i> is ⊙ a Firm ○ an Individual
Number:	This auvisory armiate is a firm and individual
Registered:	C yes ⊙ No
Name:	TORONTO-DOMINION BANK
Tunie.	(TD BANK)
	(For individuals, Last, First,
	Middle)
registered adviser's o If you are reg 11.D(4), and event listed in	should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the or advisory affiliate's favor. Gistered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any in Item 11 that occurred more than ten years ago. Should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the nees:
C _{Yes}	r <i>CRD</i> for the event? If the answer is "Yes," no other information on this DRP must be provided. No mpletion of this form does not relieve the <i>advisory affiliate</i> of its obligation to update its IARD or <i>CRD</i> records.
· II	
Regulatory Ac	tion initiated by:
	ther Federal OState OSRO OForeign
(Full name of	regulator, foreign financial regulatory authority, federal, state, or SRO) OVERNORS OF THE FEDERAL RESERVE SYSTEM" ("FEDERAL RESERVE BOARD")
Principal Sanc	tion:
	inistrative Penalt(ies) /Fine(s)
Other Sanction UNDERTAKING	
UNDERTAKING	
Date Initiated	3
	G (MM/DD/YYYY):
10/09/2024	G (MM/DD/YYYY): ● Exact C Explanation
10/09/2024	G (MM/DD/YYYY):
10/09/2024 (If not exact, p	G (MM/DD/YYYY): © Exact C Explanation provide explanation:
10/09/2024 If not exact, p	(MM/DD/YYYY): Exact © Explanation provide explanation:
10/09/2024 If not exact, p	G (MM/DD/YYYY): © Exact C Explanation provide explanation:
10/09/2024 (If not exact, p Docket/Case N 24-027-B-FB,	(MM/DD/YYYY): Exact © Explanation provide explanation:
10/09/2024 (If not exact, p Docket/Case N 24-027-B-FB,	(MM/DD/YYYY): Exact © Explanation provide explanation: Number: 24-027-CMP-FB, 24-027-B-HC, 24-027-CMP-HC ate Employing Firm when activity occurred which led to the regulatory action (if applicable):
10/09/2024 If not exact, p Docket/Case N 24-027-B-FB, Advisory Affilia	(MM/DD/YYYY): Exact © Explanation provide explanation: Number: 24-027-CMP-FB, 24-027-B-HC, 24-027-CMP-HC ate Employing Firm when activity occurred which led to the regulatory action (if applicable):
10/09/2024 If not exact, p Docket/Case N 24-027-B-FB, Advisory Affilia	(MM/DD/YYYY): Exact Explanation provide explanation: Number: 24-027-CMP-FB, 24-027-B-HC, 24-027-CMP-HC ate Employing Firm when activity occurred which led to the regulatory action (if applicable): uct Type:
10/09/2024 If not exact, p Docket/Case N 24-027-B-FB, Advisory Affilia Principal Product	(MM/DD/YYYY): Exact Explanation provide explanation: Number: 24-027-CMP-FB, 24-027-B-HC, 24-027-CMP-HC ate Employing Firm when activity occurred which led to the regulatory action (if applicable): uct Type:
10/09/2024 © If not exact, p Docket/Case N 24-027-B-FB, Advisory Affilia Principal Product No Product Other Product Describe the a	(MM/DD/YYYY): Exact Explanation provide explanation: Number: 24-027-CMP-FB, 24-027-B-HC, 24-027-CMP-HC ate Employing Firm when activity occurred which led to the regulatory action (if applicable): uct Type:

REMEDIATION OFFICE; (IV) SUBMIT COMPLIANCE PROGRAMS THAT INCLUDE RELOCATION OF BSA AND AML COMPLIANCE FUNCTIONS TO THE U.S;. (V) TO APPOINT AN INDEPENDENT CONSULTANT TO CONDUCT AN ASSESSMENT OF THE BSA AND AML PROGRAMS; (VI) PRIOR TO PAYING DIVIDENDS OR BUYING BACK SHARES, OBTAINING THE CERTIFICATION OF THE BOARD OF DIRECTORS THAT TDBNA HAVE SUFFICIENT RESOURCES TO CONDUCT REMEDIATION; AND (VII) NOT RE-HIRE EMPLOYEES INVOLVED IN MISCONDUCT. THE CIVIL MONEY PENALTY ASSOCIATED WITH THE FRB ORDER AMOUNTS TO \$123.5 MILLION. 8. Current Status? Pending On Appeal 9. If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed: If Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only. 10. How was matter resolved: Consent 11. Resolution Date (MM/DD/YYYY): 10/09/2024 © Exact C Explanation If not exact, provide explanation: ORDER TO CEASE AND DESIST AND ORDER OF ASSESSMENT OF A CIVIL MONEY PENALTY ISSUED UPON CONSENT, PURSUANT TO THE FEDERAL DEPOSIT INSURANCE ACT, AS AMENDED. 12. Resolution Detail: A. Were any of the following Sanctions Ordered (check all appropriate items)? ✓ Monetary/Fine Amount: \$ 123,500,000.00 ☐ Disgorgement/Restitution Revocation/Expulsion/Denial ☐ Censure Cease and Desist/Injunction ☐ Bar Suspension B. Other Sanctions Ordered: THE FRB ORDER REQUIRES TD BANK, TDBUSH AND TDGUS TO (I) SUBMIT WRITTEN PLANS TO OVERSEE REMEDIATION; (II) RETAIN A THIRD PARTY TO ASSESS THE EFFECTIVENESS OF CORPORATE GOVERNANCE, BOARD AND U.S. MANAGEMENT STRUCTURE, AND STAFFING NEEDS; (III) ESTABLISH A U.S. REMEDIATION OFFICE; (IV) SUBMIT COMPLIANCE PROGRAMS THAT INCLUDE RELOCATION OF BSA AND AML COMPLIANCE FUNCTIONS TO THE U.S;. (V) TO APPOINT AN INDEPENDENT CONSULTANT TO CONDUCT AN ASSESSMENT OF THE BSA AND AML PROGRAMS; (VI) PRIOR TO PAYING DIVIDENDS OR BUYING BACK SHARES, OBTAINING THE CERTIFICATION OF THE BOARD OF DIRECTORS THAT TDBNA HAVE SUFFICIENT RESOURCES TO CONDUCT REMEDIATION; AND (VII) NOT RE-HIRE EMPLOYEES INVOLVED IN MISCONDUCT. Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an advisory affiliate, date paid and if any portion of penalty was waived: THE ORDER REQUIRED THE PARTIES TO PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$123.5 MILLION, WHICH WAS PAID ON OCTOBER 10, 2024. 13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided). THE FEDERAL RESERVE BOARD ENTERED A CEASE-AND-DESIST ORDER AND ORDER OF ASSESSMENT OF A CIVIL MONETARY PENALTY ON OCTOBER 9, 2024 AGAINST TD BANK, TDBUSH AND TD GUS, UNDER SECTIONS 8(B) AND 8(I)(2)(B) OF THE FEDERAL DEPOSIT INSURANCE ACT, REQUIRING TD BANK, TDBUSH AND TDGUS TO (I) SUBMIT WRITTEN PLANS TO OVERSEE REMEDIATION; (II) RETAIN A THIRD PARTY TO ASSESS THE EFFECTIVENESS OF CORPORATE GOVERNANCE, BOARD AND U.S. MANAGEMENT STRUCTURE, AND STAFFING NEEDS; (III) ESTABLISH A U.S. REMEDIATION OFFICE; (IV) SUBMIT COMPLIANCE PROGRAMS THAT INCLUDE RELOCATION OF BSA AND AML COMPLIANCE FUNCTIONS TO THE U.S;. (V) TO APPOINT AN INDEPENDENT CONSULTANT TO CONDUCT AN ASSESSMENT OF THE BSA AND AML PROGRAMS; (VI) PRIOR TO PAYING DIVIDENDS OR BUYING BACK SHARES, OBTAINING THE CERTIFICATION OF THE BOARD OF DIRECTORS THAT TDBNA HAVE SUFFICIENT RESOURCES TO CONDUCT REMEDIATION; AND (VII) NOT RE-HIRE EMPLOYEES INVOLVED IN MISCONDUCT. THE CIVIL MONEY PENALTY ASSOCIATED WITH THE FRB ORDER AMOUNTS TO \$123.5 MILLION. NEITHER EPOCH NOR ITS EMPLOYEES WERE INVOLVED IN THE UNDERLYING CONDUCT AT ISSUE NOR DID THIS MATTER INVOLVE THE PROVISION OF INVESTMENT ADVISORY SERVICES BY EPOCH OR ITS EMPLOYEES. CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)

No Information Filed

COMPANY FOR TD BANK'S U.S. OPERATIONS, UNDER SECTIONS 8(B) AND 8(I)(2)(B) OF THE FEDERAL DEPOSIT INSURANCE ACT. THE FRB ORDER REQUIRES TD BANK, TDBUSH AND TDGUS TO (I) SUBMIT WRITTEN PLANS TO OVERSEE REMEDIATION; (II) RETAIN A THIRD PARTY TO ASSESS THE EFFECTIVENESS OF CORPORATE GOVERNANCE, BOARD AND U.S. MANAGEMENT STRUCTURE, AND STAFFING NEEDS; (III) ESTABLISH A U.S.

Part 2			
Exemption from brochure delivery re	quirements for SEC-registered advisers		
SEC rules exempt SEC-registered adviser brochure to <i>all</i> of your advisory clients, y	s from delivering a firm brochure to some kinds of clients. ou do not have to prepare a brochure.	If these exemptions excuse you from delivering a	
		Yes No	
Are you exempt from delivering a brochure to all of your clients under these rules?			
If no, complete the ADV Part 2 filing belo	w.		
Amend, retire or file new brochures:			
Brochure ID	Brochure Name	Brochure Type(s)	
85723	EPOCH INVESTMENT PARTNERS FORM	High net worth individuals, Pension plans/profit	
	ADV PART 2A	sharing plans, Pension consulting,	
		Foundations/charities, Government/municipal, Other	
		institutional, Private funds or pools, Wrap program	
	·		

CRS Type(s) Affiliate Info Retire Investment Adviser Investment Adviser

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: Date: MM/DD/YYYY
DAVID A. BARNETT 01/28/2025
Printed Name: Title:

DAVID A. BARNETT CHIEF COMPLIANCE OFFICER

Adviser CRD Number:

131556

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

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

1. Appointment of Agent for Service of Process

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

2. Appointment and Consent: Effect on Partnerships

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

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

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

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits

and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

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

Signature: Date: MM/DD/YYYY

Printed Name: Title:

Adviser CRD Number:

131556

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