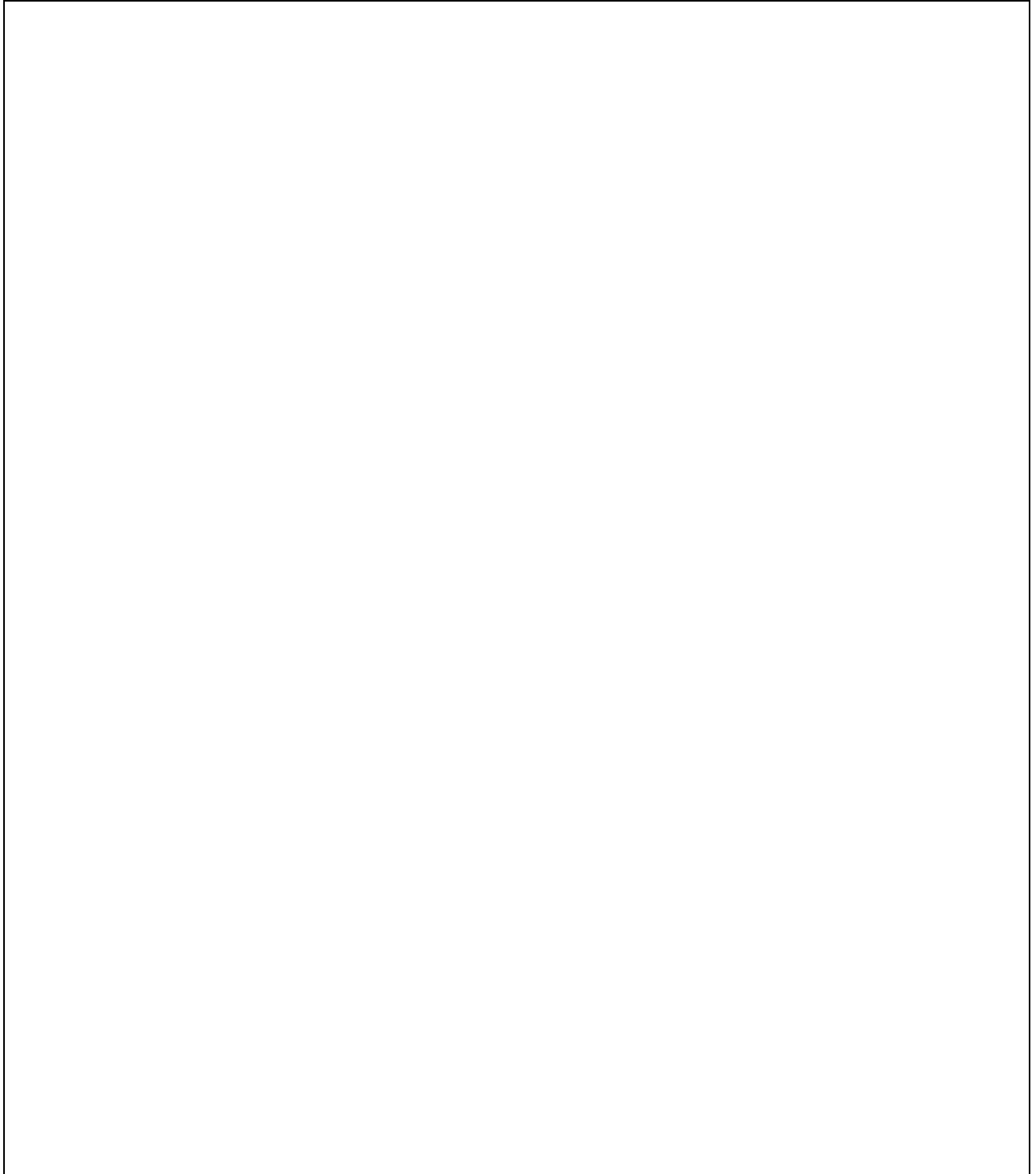


Part 2A of Form ADV: Firm *Brochure*

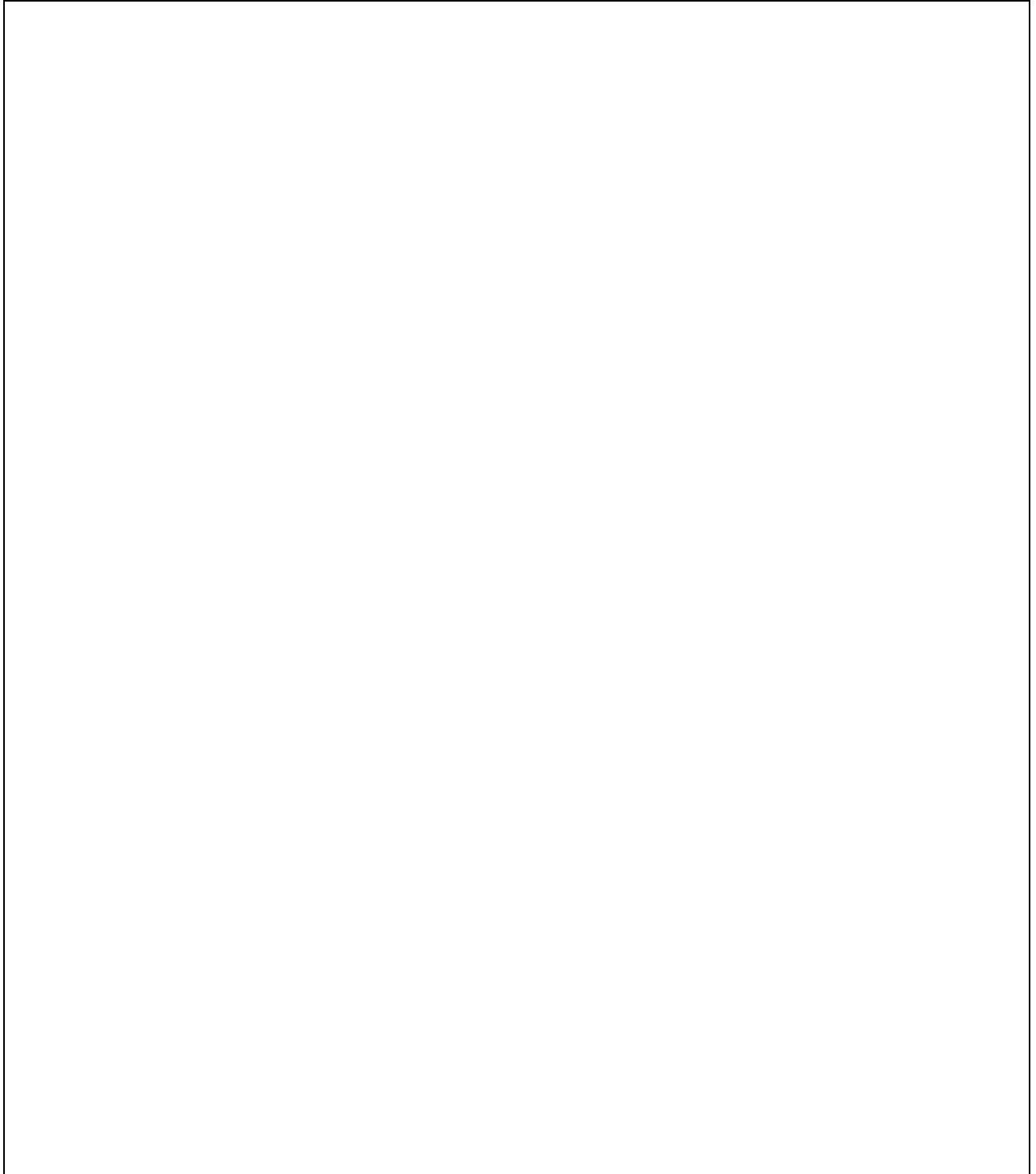
Item 1 Cover Page

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Item 2 Material Changes

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Item 4 Advisory Business

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Item 5 Fees and Compensation

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Item 6 *Performance-Based Fees* and Side-By-Side Management

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Item 7 Types of *Clients*

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Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

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Item 9 Disciplinary Information

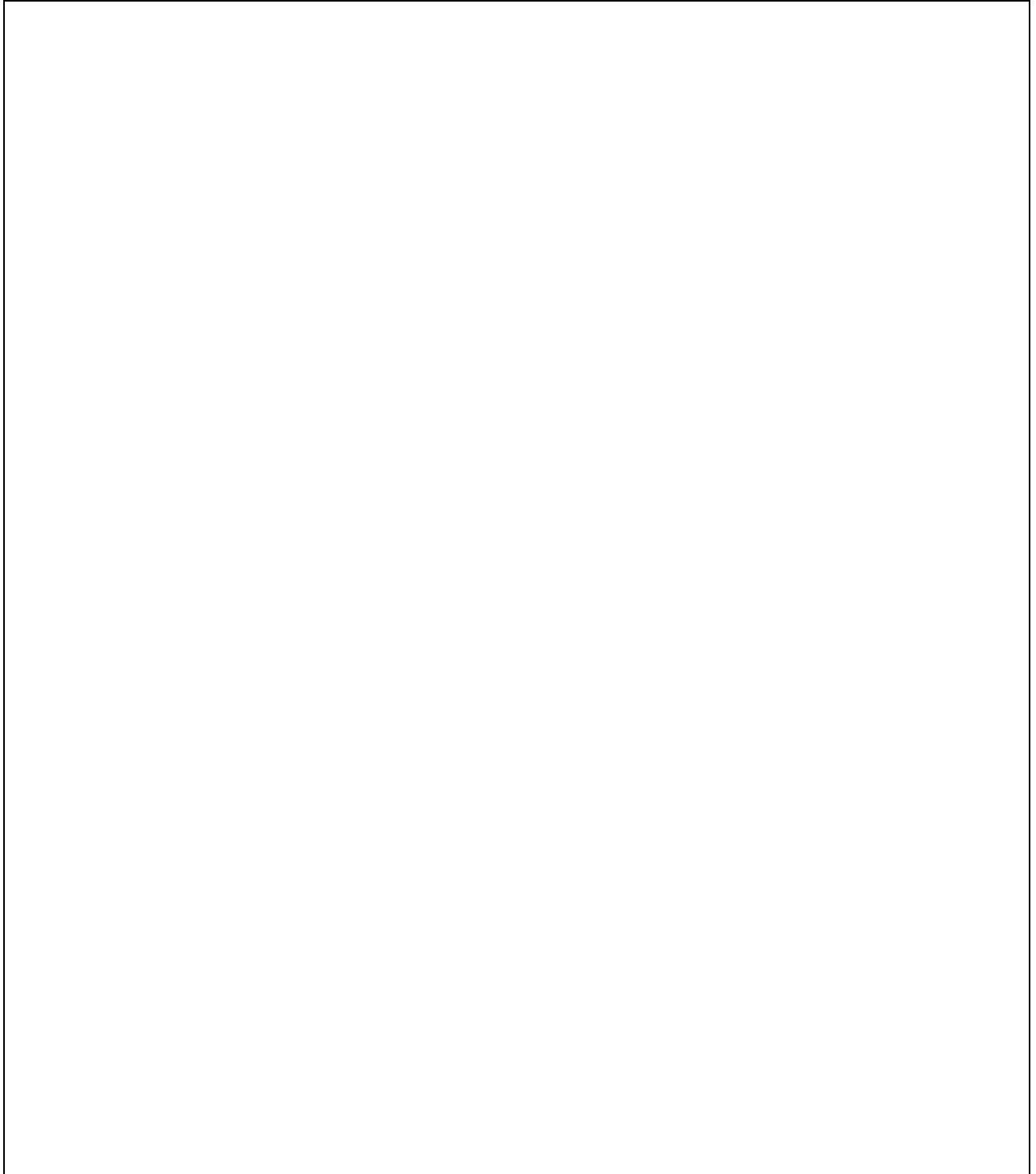
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Item 10 Other Financial Industry Activities and Affiliations

This area is reserved for the disclosure of information regarding other financial industry activities and affiliations. The content of this section is currently blank.

Item 11 Code of Ethics, Participation or Interest in *Client* Transactions and Personal Trading

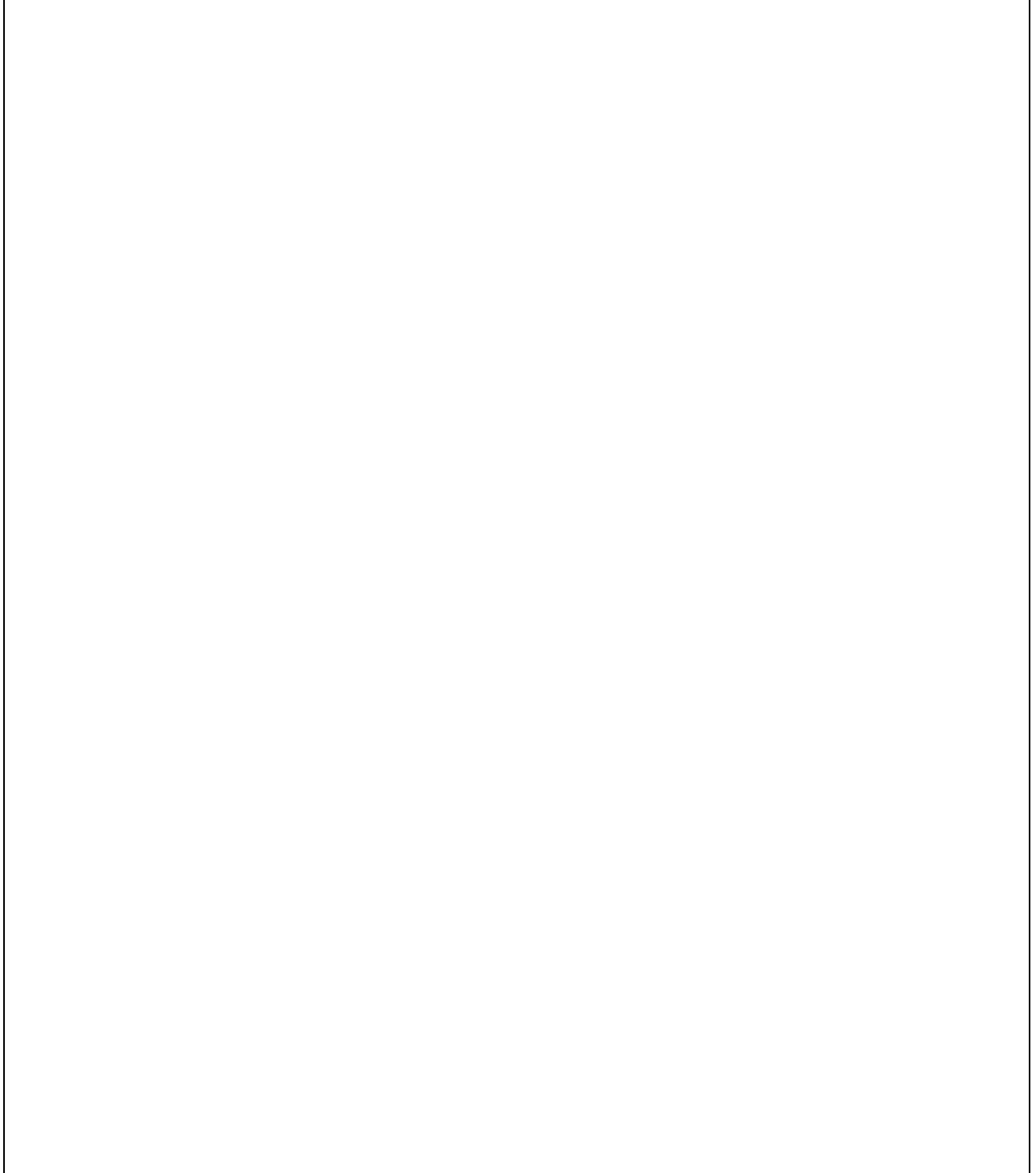
Item 12 Brokerage Practices

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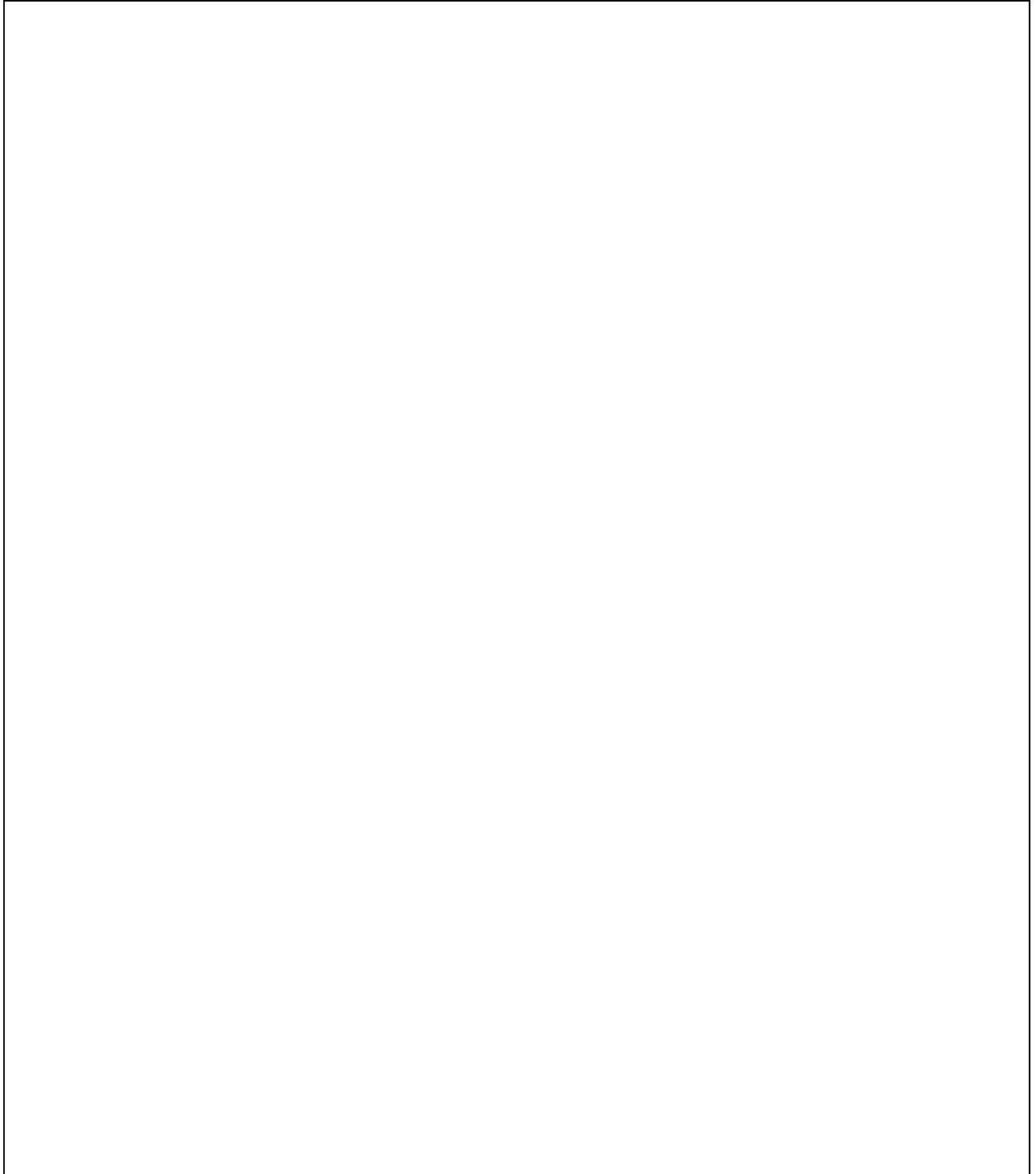
Item 13 Review of Accounts

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Item 14 *Client Referrals and Other Compensation*



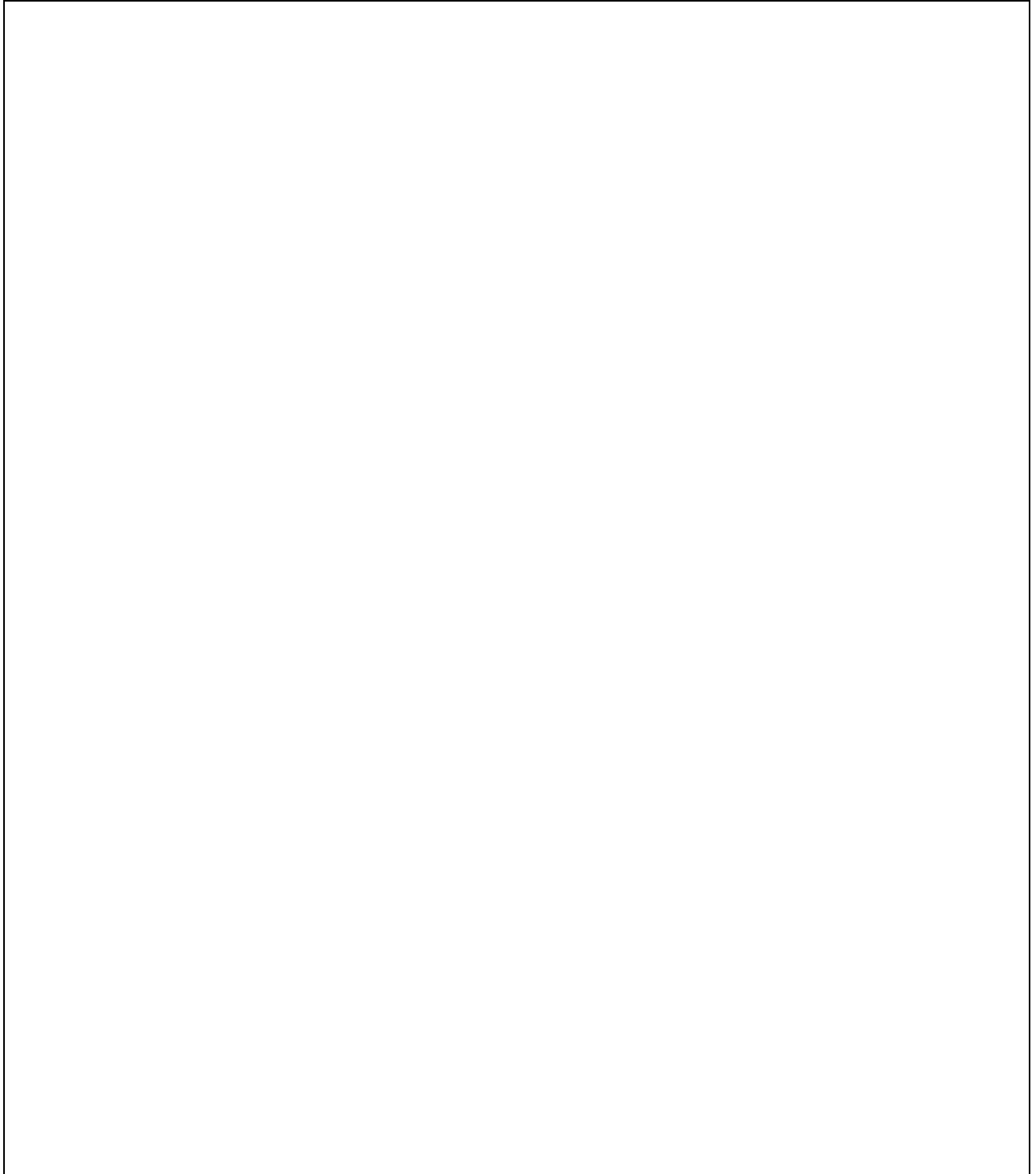
Item 15 *Custody*



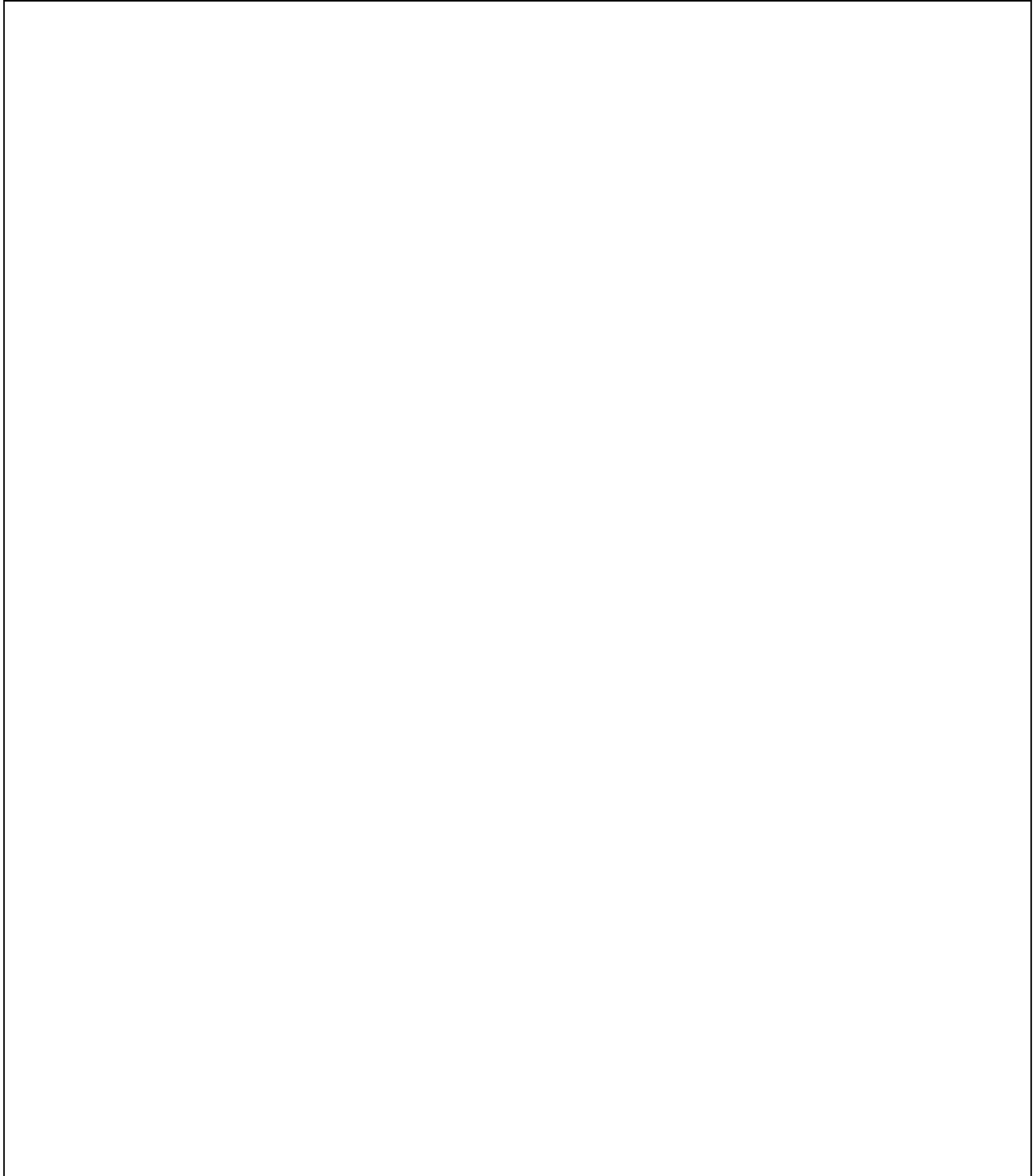
Item 16 Investment Discretion

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Item 17 Voting *Client* Securities

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Item 18 Financial Information

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Item 19 Requirements for State-Registered Advisers

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Part 2B of Form ADV: *Brochure Supplement*

Item 1 Cover Page

A large, empty rectangular box with a thin black border, occupying the majority of the page below the 'Item 1 Cover Page' label. This box is intended for the user to provide the content for the cover page of the brochure supplement.

Item 2 Educational Background and Business Experience

Item 3 Disciplinary Information

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Item 4 Other Business Activities

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Item 5 Additional Compensation

Year	Additional Compensation
2017	
2018	
2019	
2020	
2021	
2022	
2023	
2024	
2025	
2026	
2027	
2028	
2029	
2030	

Item 6 Supervision

A large, empty rectangular box with a thin black border, occupying most of the page below the section header. It is intended for the user to provide details regarding supervision.

Item 7 Requirements for State-Registered Advisers