

RE: DOL 408(b)(2) Disclosure Document

This disclosure document provides an overview of the investment services Segall Bryant & Hamill ("SBH") provides to employee benefit plans subject to Title I of the Employee Retirement Income Security Act of 1974, as amended ("ERISA") (each such employee benefit plan being referred to as the "Plan") through separately managed accounts. This disclosure document is being provided to the "responsible plan fiduciary" to the Plan in compliance with Department of Labor Regulation 29 C.F.R 2550.408b-2. This disclosure document is intended to be read in conjunction with our ADV Part 2A, as may be amended or supplemented from time to time, your Account Agreement [and other documents referenced in this disclosure document]. You may obtain a copy of the ADV at http://www.adviserinfo.sec.gov.

Under ERISA, a plan sponsor or other fiduciary has a fiduciary responsibility to prudently select and monitor those hired to provide services to the plan and their related fees and compensation, to ensure, among other things, that the service arrangements and the compensation received by the service provider are reasonable in light of the services provided. This disclosure document is designed to assist you in meeting that fiduciary responsibility.

Your plan may receive services from other service providers, such as a third-party administrator or a custodian, which are outside the scope of this document. Moreover, SBH or its affiliates may provide services to your plan under separate arrangements not described herein. For information on those services and related fees and expenses, please refer to those service providers' separate 408(b)(2) disclosure documents or contact those service providers. To the extent that you receive services from SBH (or its affiliate) that are outside of the scope of the services covered by this Disclosure Document, please reference the disclosure documents specifically relating to those services.

If you have any questions concerning this 408(b)(2) disclosure document or the information provided to you concerning our services and compensation or to obtain a copy of the Account Agreement [and other related documents], please contact the associate.

Sincerely,

Philip L. Hildebrandt Chief Executive Office

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If you are not the 'responsible plan fiduciary' authorized to engage the service providers, including SBH, for your Plan, please forward this 408(b)(2) Disclosure Document to the appropriate responsible Plan fiduciary.

Guide to Information Required by Section 408(b)(2) Regulation	on
Required Information	Page
Description of the services SBH will provide to your Plan	3
A statement concerning the services that SBH will provide as a registered investment adviser	3
The <u>direct</u> compensation SBH will receive from your Plan	3
The <u>indirect</u> compensation SBH will receive from other parties	3
The compensation that will be paid among SBH, an affiliate or a sub-	
contractor, if transaction based or charged directly against the Plan's investment	None
The compensation that SBH will receive upon termination of the contract	4
The cost to your Plan for recordkeeping services	Not Applicable
The compensation that SBH will charge directly against your Plan's investments and not included in the annual operating expenses. (Applies only to covered service providers (CSP's) that provide fiduciary services to an investment contract, product or entity that holds plan assets and in which the covered plan has a direct equity investment.)	Not Applicable
The SBH annual operating expenses if the return is not fixed and any ongoing expenses in addition to annual operating expenses. (Applies only to CSP's that provide fiduciary services to an investment contract, product or entity that holds plan assets and in which the covered plan has a direct equity investment.)	Not Applicable
For any contract/product/entity in which SBH is a designated investment alternative, additional information regarding the investment alternative	Not Applicable
How compensation is received by SBH	3



• <u>Description of the services SBH will provide to your Plan and the direct compensation (including the payment method/frequency) SBH will receive from your Plan.</u>

Your Plan has retained Segall Bryant & Hamill (SBH) as a discretionary investment manager pursuant to the terms and conditions of your Investment Advisory Agreement with us. For a full description of the services that SBH provides to your Plan, the direct fees that are paid by the Plan and the method/frequency of these payments, please refer to your Investment Advisory Agreement with SBH and its attached Fee Schedule.

• A statement concerning the services that SBH will provide as a registered investment adviser

Pursuant to the terms of Investment Management Agreement, and to the extent provided therein, SBH will act as a fiduciary under ERISA, and as an investment adviser under the federal Investment Advisers Act of 1940 and applicable state law.

• The indirect compensation SBH will receive from other parties

The following table describes potential sources of indirect compensation that SBH *may* receive in connection with the provision of it services under the Investment Advisory Agreement (i.e. those fees or other compensation that may be received by SBH from parties other than your Plan or the Plan sponsor).

Types of Indirect Compensation	Notes
Soft Dollars / Commission Sharing	As of the date of this disclosure document,
Agreements	SBH currently has Commission Sharing
	Agreements (CSA's) in effect with Barclays,
	Cowen, Goldman Sachs, Jefferies, JP Morgan,
	Macquarie, Raymond James, RBC Capital
	Markets LLC, Wells Fargo Securities, LLC.
	These commission sharing agreements
	provide SBH access to third party research
	services that fall within the safe harbor of
	section 28e of the Securities Exchange Act of
	1934 as amended. The research includes but
	is not limited to written reports on individual
	companies and sectors, general economic
	conditions, pertinent federal and state
	legislative developments and comparative



	and evaluation and technical measurement services for issuers, industries and the market as a whole. For further information related to SBH's use of soft dollars and Commission Sharing Agreements, please refer to the ADV Part 2A.
Affiliated Brokerage	SBH does not engage in any affiliated brokerage transactions.
Order Flow Compensation	SBH does not receive any compensation as a result of order flow.
Conferences and Training provided by Brokers or other third parties	SBH may attend broker sponsored Conferences or Training sessions for access to company management.
Receipt of Gifts, Gratuities and other non-monetary compensation	Per the SBH Code of Ethics, no supervised person is allowed to receive any gift or service more than a de minimis value from any person or entity that SBH does business with. SBH traders may from time to time receive small de minimis gifts (e.g. holiday fruit basket) from brokerage firms.

• The compensation that SBH will receive upon termination of the contract

SBH does not receive any compensation in connection with the termination of the Investment Advisory Agreement. Advisory fees will be prorated to the date of termination of such Agreement and any fees paid in arrears will be refunded to the Plan pro-rata as of the date of termination.

FORM ADV

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

Primary Business Name: SEGALL BRYANT & HAMILL

Annual Amendment - All Sections

Rev. 10/2021

3/29/2022 8:56:35 AM

WA	•	•	•	your application, revocation of your registrati ents. See Form ADV General Instruction 4.	on,			
Iten	tem 1 Identifying Information							
the				ct you. If you are filing an <i>umbrella registratio</i> rides information to assist you with filing an	on,			
A.	A. Your full legal name (if you are a sole proprietor, your last, first, and middle names): SEGALL BRYANT & HAMILL, LLC							
В.	B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A. SEGALL BRYANT & HAMILL							
	List on Section 1.1	. of Schedule D any additional names	under which you conduct your advis	ory business.				
	(2) If you are usir	g this Form ADV to register more than	n one investment adviser under an <i>ui</i>	mbrella registration, check this box \square				
	If you check this b	ox, complete a Schedule R for each re	elying adviser.					
C.	whether the name		em 1.A.) or primary business name ((Item 1.B.(1)), enter the new name and speci	fy			
D.	(1) If you are regi	stered with the SEC as an investment	adviser, your SEC file number: 801-	47232				
	(2) If you report t	the SEC as an exempt reporting adv	iser, your SEC file number:					
	· / /	e or more Central Index Key numbers	assigned by the SEC ("CIK Numbers	s"), all of your CIK numbers:				
	CIK Number				_			
	1006378							
E.	(1) If you have a	umber (" <i>CRD</i> Number") assigned by t	the <i>FINRA's CRD</i> system or by the IA	ARD system, your <i>CRD</i> number: 106505				
	If your firm does i affiliates.	ot have a CRD number, skip this Item	n 1.E. Do not provide the CRD numbe	er of one of your officers, employees, or				
	(2) If you have ad	ditional <i>CRD</i> Numbers, your additional	I CRD numbers:					
			No Information Filed					
F.	Principal Office an	l Place of Business						
	. ,	ot use a P.O. Box):						
	Number and		Number and Street 2:					
	City:	DISON STREET State:	SUITE 1900 Country:	ZIP+4/Postal Code:				
	CHICAGO	Illinois	United States	60661-2551				
	If this addres	is a private residence, check this box	«: □					
	advisory busi of your office.	ess. If you are applying for registration in the state or states to which you ar	on, or are registered, with one or mo re applying for registration or with wi	of business, at which you conduct investment ore state securities authorities, you must list a hom you are registered. If you are applying fo SEC as an exempt reporting adviser, list the	1//			

Name:

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/22,	7:57	AM	IA	ARD - All Sections [User Name: j	sanjuan, OrgID: 106505]				
		largest twenty-five o	ffices in terms of numbers of	of employees as of the end of y	our most recently completed fiscal year.				
	(2)	Days of week that yo	ou normally conduct busines	ss at your <i>principal office and pl</i>	lace of business:				
		● Monday - Friday C Other:							
		Normal business hou	rs at this location:						
	(0)	8:30 A.M 5 P.M.							
	(3)	Telephone number at 1-800-836-4265	this location:						
	(4)	Facsimile number at	this location, if any:						
		312-474-0521	, ,						
	(5)		nber of offices, other than y nd of your most recently cor		f business, at which you conduct investment a	dvisory			
G.	Mail	ing address, if differe	nt from your <i>principal office</i>	and place of business address	:				
	Nur	mber and Street 1:		Number and Street 2:					
	City	y:	State:	Country:	ZIP+4/Postal Code:				
	If t	his address is a privat	te residence, check this box	: □					
н.			or, state your full residence	address, if different from your ,	principal office and place of business address i	n Item			
	1.F.:								
		mber and Street 1:		Number and Street 2:					
	City	y:	State:	Country:	ZIP+4/Postal Code:				
I.	-	you have one or more ebook and LinkedIn)?	websites or accounts on pu	ublicly available social media pla	atforms (including, but not limited to, Twitter,	Yes I	No C		
	Sect web not prov	tion 1.I. of Schedule L , you may list the por provide the addresses	D. If a website address serv tal without listing addresse: s of websites or accounts or	es as a portal through which to s for all of the other information n publicly available social media	nts on publicly available social media platforms access other information you have published on the second on the portal and platforms where you do not control the contesses of employee accounts on publicly available	on the address. L nt. Do no			
J.	Chie	ef Compliance Officer							
				r Chief Compliance Officer. If yo r, if you have one. If not, you m	ou are an <i>exempt reporting adviser</i> , you must nust complete Item 1.K. below.	provide t	he		
		me: JL A. LYTHBERG		Other titles, if any: CHIEF OPERATING					
		ephone number: 2-474-4122		Facsimile number, 312-474-0521	Facsimile number, if any: 312-474-0521				
		mber and Street 1: D WEST MADISON ST	REET	Number and Street SUITE 1900	: 2:				
	City CH	y: ICAGO	State: Illinois	Country: United States	ZIP+4/Postal Code: 60661-2551				
		ctronic mail (e-mail) a THBERG@SBHIC.COM	address, if Chief Compliance 1	e Officer has one:					
	regi	stered under the Inve		40 that you advise for providing	er than you, a <i>related person</i> or an investmen g chief compliance officer services to you, prov		ny		
		Name:							
	IRS	Employer Identification	on Number:						
K.			ntact Person: If a person oth orm ADV, you may provide t	-	Officer is authorized to receive information and	respond			

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Titles:

SENIOR COMPLIANCE MANAGER

	Telephone number: 312-474-5960		Facsimile number, if any 312-278-0314	:		
	Number and Street 1: 540 WEST MADISON STREET		Number and Street 2: SUITE 1900			
	City: CHICAGO	State: Illinois	Country: United States	ZIP+4/Postal Code: 60661		
	Electronic mail (e-mail) address, if JSANJUAN@SBHIC.COM	contact person has on	e:			
					Yes	No
L.	Do you maintain some or all of the state law, somewhere other than you			tion 204 of the Advisers Act, or similar	•	0
	If "yes," complete Section 1.L. of S	chedule D.			Yes	No
М.	Are you registered with a foreign fi	nancial regulatory auth	ority?		0	•
	Answer "no" if you are not register foreign financial regulatory authorit	•	·	you have an affiliate that is registered w		
N.	Are you a public reporting company	under Sections 12 or	15(d) of the Securities Eychang	e Act of 19342		No
IN.	Are you a public reporting company	dilder Sections 12 of	13(d) of the Securities Exchange	e Act 01 1934:	0	0
Ο.	Did you have \$1 billion or more in a If yes, what is the approximate am		of your most recent fiscal year?		Yes C	No
	f C \$1 billion to less than \$10 billi	on				
	$_{ m C}$ \$10 billion to less than \$50 bil	lion				
	C \$50 billion or more					
P.	total assets using the total assets s Provide your <i>Legal Entity Identifier</i> 54930071TXHX24MK8P61	hown on the balance s	heet for your most recent fiscal	s you manage on behalf of clients. Detern year end. ne financial marketplace. You may not ha	ŕ	
SEC ⁻	TION 1.B. Other Business Names					
			No Information Filed			
SEC ⁻	TION 1.F. Other Offices					
ad\ reg	visory business. You must complete a	separate Schedule D	Section 1.F. for each location. If	of business, at which you conduct investn you are applying for SEC registration, if wenty-five offices (in terms of numbers o	you ar	e
	mber and Street 1: 755 N. OUTER FORTY ROAD		Number and Street 2: SUITE 208			
City	y: ESTERFIELD	State: Missouri	Country: United States	ZIP+4/Postal Code: 63017		
	his address is a private residence, ch					

Telephone Number: 800-836-4265	Facsimile Number	r, if any:				
If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the CRD Branch Number here:						
How many <i>employees</i> perform investment advisory functions from this office location? 2						
Are other business activities conducted at this office location? (check all that apply) \square (1) Broker-dealer (registered or unregistered) \square (2) Bank (including a separately identifiable department or division of a bank)						
(2) Bank (melading a separately identifiable (acparement of arv	ision of a barney				
\square (4) Commodity pool operator or commodity t	rading advisor (w	hether registered or exempt fro	m registration)			
\square (5) Registered municipal advisor						
\square (6) Accountant or accounting firm						
\square (7) Lawyer or law firm						
Describe any other <i>investment-related</i> business	activities conduc	ted from this office location:				
Complete the following information for each offi advisory business. You must complete a separar registered only with the SEC, or if you are an exemployees).	te Schedule D Sec	ction 1.F. for each location. If yo	u are applying for SEC registration, if you are			
Number and Street 1: 1415 PANTHER LANE		Number and Street 2: SUITE 142				
City: NAPLES	State: Florida	Country: United States	ZIP+4/Postal Code: 34109			
If this address is a private residence, check this	box: □					
Telephone Number: 1-800-836-4265	Facsimile Numb	er, if any:				
If this office location is also required to be regis investment adviser on the Uniform Branch Offic		•				
How many <i>employees</i> perform investment advises	sory functions fro	m this office location?				
Are other business activities conducted at this)	,				
(4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (5) Registered municipal advisor						
\square (6) Accountant or accounting firm \square (7) Lawyer or law firm	(6) Accountant or accounting firm					
Describe any other <i>investment-related</i> business	activities conduc	ted from this office location:				
Complete the following information for each offi	ce, other than vo	ur principal office and place of b	usiness, at which you conduct investment			

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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: 32 PARKING PLAZA		Number and Street SUITE 700	2:			
•	State: Pennsylvania	Country: United States	ZIP+4/Postal Code: 19003			
If this address is a private residence, check t	his box:					
•	Facsimile Number, if an 610-672-9813	y:				
If this office location is also required to be re investment adviser on the Uniform Branch O	=		by as a branch office location for a broker-dealer or the CRD Branch Number here:			
How many <i>employees</i> perform investment as 4	dvisory functions from t	his office location?				
☐ (1) Broker-dealer (registered or unregiste☐ (2) Bank (including a separately identifiab☐ (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					
Describe any other investment-related busin	ess activities conducted	from this office location:				
	arate Schedule D Sectio	n 1.F. for each location. If	of business, at which you conduct investment f you are applying for SEC registration, if you are wenty-five offices (in terms of numbers of			
Number and Street 1: 370 17TH STREET		Number and Street 2: SUITE 5000				
City: DENVER	State: Colorado	Country: United States	ZIP+4/Postal Code: 80202			
If this address is a private residence, check t	his box:					
Telephone Number: 303-312-5000	Facsimile Number, if 303-312-4900	any:				
If this office location is also required to be re investment adviser on the Uniform Branch O 107293	-		by as a branch office location for a broker-dealer or the CRD Branch Number here:			
How many <i>employees</i> perform investment ac 21	dvisory functions from t	his office location?				
Are other business activities conducted at thi \Box (1) Broker-dealer (registered or unregiste \Box (2) Bank (including a separately identifiab	•	k all that apply)				

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\square (3) Insurance broker or agent						
☑ (4) Commodity pool operator or commodity	trading advisor (whether registered or exempt	t from registration)			
\square (5) Registered municipal advisor						
\square (6) Accountant or accounting firm						
(7) Lawyer or law firm						
Describe any other <i>investment-related</i> busines	ss activities condu	cted from this office location:				
SECTION 1.I. Website Addresses				_		
				_		
List your website addresses, including address (including, but not limited to, Twitter, Facebool account on a publicly available social media place.	k and/or LinkedIn		dia platforms where you control the content rate Schedule D Section 1.I. for each website or			
Address of Website/Account on Publicly Availal	ble Social Media P	latform: HTTPS://WWW.SB	HFUNDS.COM			
Address of Website/Account on Publicly Availal	ble Social Media P	latform: HTTPS://WWW.LIN	NKEDIN.COM/COMPANY/SEGALL-BRYANT-&-HAMILL/			
Address of Website/Account on Publicly Availal	ble Social Media P	latform: HTTPS://WWW.SB	HIC.COM			
				_		
SECTION 1.L. Location of Books and Record	is					
Complete the following information for each lo business. You must complete a separate Scheo			ds, other than your <i>principal office and place of</i>			
Name of entity where books and records are k SBH DENVER OFFICE	ept:					
Number and Street 1: 370 17TH STREET		Number and Street 2: SUITE 5000				
City:	State:	Country:	ZIP+4/Postal Code:			
DENVER	Colorado	United States	80202			
If this address is a private residence, check th	is box: □					
Talanhan a Niveahan	Fa asiasila mumah	:f				
Telephone Number: 303-312-5000	Facsimile numb 303-312-4900	er, ir 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 FINANCIAL RECORDS, CONTRACTS / AGREEM COMMUNICATIONS, CLIENT RELATED FILES /	ENTS, SOLICITOR					
Name of entity where books and records are k IRON MOUNTAIN RECORDS MANAGEMENT DE	•					
Number and Street 1:		Number and Street 2:				

			,,,g · · · · · · · · · · · · · · · · · ·				
5050 MOLINE STREET							
City:	State:	Country:	ZIP+4/Postal Code:				
DENVER	Colorado	United States	80239				
TO the control of the							
if this address is a private residence, check th	If this address is a private residence, check this box: \Box						
Telephone Number:	Telephone Number: Facsimile number, if any:						
303-373-0557	303-371-2897	· ·					
This is (check one):							
C one of your branch offices or affiliates.							
C a third-party unaffiliated recordkeeper.							
● other.							
Priofly describe the beats and records tract to	this location						
Briefly describe the books and records kept at CLIENT RELATED STATEMENTS AND CORRESP		D ACCOUNTS). TRADING RE	LATED DOCUMENTS, SOME MISCELLANEOUS				
CORPORATE RECORDS, TAPE BACKUPS OF TH		is necessition, in the ne	E TES SOCIALITIS, SOTIE THEOLES WESOS				
Name of entity where books and records are k	cept:						
IRON MOUNTAIN RECORDS MANAGEMENT CH							
Number and Street 1:		Number and Street 2:					
1320 S. ROCKWELL ST							
City:	State:	Country:	ZIP+4/Postal Code:				
CHICAGO	Illinois	United States	60608				
	–						
If this address is a private residence, check th	is box:						
Talanhana Namahan	Es estastis acc						
Telephone Number: 1-800-899-4766	Facsimile nur	mber, ir any:					
1 000 055 1700							
This is (check one):							
O one of your branch offices or affiliates.							
a third-party unaffiliated recordkeeper.							
⊙ other.							
Briefly describe the books and records kept at VARIOUS CLIENT, ACCOUNT AND COMPLIANCE		NED THAN TWO VEADS					
VARIOUS CLIENT, ACCOUNT AND COMPLIANCE	L VECOKDS OFD	PLK ITIAN IWU TEAKS.					
SECTION 1.M. Registration with Foreign Fir	nancial Regula	tory Authorities					

No Information Filed

Item 2 SEC Registration/Reporting

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

111101	normation in Real 2 Should be provided for the ming daviser 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):							
	$\overline{\mathbf{v}}$	(1)	are a large advisory fi	rm that either:				
			(a) has regulatory asset	s under management of \$100 mi	llion (in U.S. dollars) or more; or			
			• • •	es under management of \$90 milling t and is registered with the SEC;	ion (in U.S. dollars) or more at the t	ime of filing its most recent annual		
		(2)		ory firm that has regulatory asset S. dollars) and you are either:	ts under management of \$25 million	(in U.S. dollars) or more but less		
			(a) not required to be re office and place of b	·	tate securities authority of the state	where you maintain your <i>principal</i>		
			(b) not subject to exam business;	ination by the state securities aut	thority of the state where you mainta	ain your <i>principal office and place of</i>		
			Click HERE for a list securities authority.	of states in which an investment	adviser, if registered, would not be	subject to examination by the state		
		(3)	Reserved					
		(4)	have your <i>principal office</i>	e and place of business outside t	the United States;			
		(5)	are an investment adv 1940;	riser (or subadviser) to an inve	estment company registered unde	r the Investment Company Act of		
	are an investment adviser to a company which has elected to be a business development company pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management;							
	(7) are a pension consultant with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);							
	(8) are a related adviser under rule 203A-2(b) that <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, co	mplete Section 2.A.(8) of Schedu	ıle D.			
		(9)	are an adviser relying o	on rule 203A-2(c) because you ex	pect to be eligible for SEC regist	ration within 120 days;		
			If you check this box, co	emplete Section 2.A.(9) of Schedu	ile D.			
		(10)	are a multi-state advis	ser that is required to register in	15 or more states and is relying on I	rule 203A-2(d);		
				emplete Section 2.A.(10) of Sched				
		(11)	are an Internet advise	r relying on rule 203A-2(e);				
		(12)	have received an SEC	order exempting you from the pr	ohibition against registration with th	ne SEC;		
			If you check this box, co	emplete Section 2.A.(12) of Sched	tule D.			
		(13)	are no longer eligible	to remain registered with the SEC				
				-				
Stat	e Se	curit	ies Authority Notice Fil	lings and State Reporting by E	xempt Reporting Advisers			
C.	secution box is an rece	endme urities (es) n n ame	ents they file with the SEC authorities with a copy of ext to the state(s) that your endment to direct your no otice of this and all subse	C. These are called <i>notice filings</i> . If reports and any amendments thou would like to receive notice of <i>tice filings</i> or reports to additiona quent filings or reports you subm	de to state securities authorities a co In addition, exempt reporting advise ney file with the SEC. If this is an ini- this and all subsequent filings or rep I state(s), check the box(es) next to it to the SEC. If this is an amendme them, uncheck the box(es) next to	trs may be required to provide state tial application or report, check the ports you submit to the SEC. If this the state(s) that you would like to not to your registration to stop your		
	Jur	isdicti	ons					
	☑ AL ☑ IL ☑ NE ☑ SC							

☑ AK	☑ IN	☑ NV	☑ SD
☑ AZ	☑ IA	☑ NH	☑ TN
☑ AR	☑ KS	☑ NJ	☑ TX
☑ 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
 ні	Г мо	₽ PR	
☑ ID	☑ MT	☑ RI	

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

SECTION 2.A.(8) Related Adviser

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

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser

SEC Number of Registered Investment Adviser

-

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

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

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

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

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

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

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

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

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

SECTION 2.A.(12) SEC Exemptive Order
If you are relying upon an SEC order exempting you from the prohibition on registration, provide the following information:
Application Number:
803-
Date of <i>order</i> :

Item 3 Form of Organization

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

- A. How are you organized?
 - C Corporation
 - C Sole Proprietorship
 - C Limited Liability Partnership (LLP)
 - C Partnership
 - ← Limited Liability Company (LLC)
 - C Limited Partnership (LP)
 - C Other (specify):

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

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

State Country

Delaware United States

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

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

Item 4 Successions

Yes No

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.

 119
- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
 60
 - (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*?

13

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

0

- (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?
 7

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?

11

- (2) Approximately what percentage of your *clients* are non-*United States persons*?
- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

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

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

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

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

Type of Client (1) Number of (2) Fewer (3) Amount of Regulatory Assets

	Client(s)	than 5 <i>Clients</i>	under Management
(a) Individuals (other than high net worth individuals)	722		\$ 651,742,523
(b) High net worth individuals	1083		\$ 6,401,514,301
(c) Banking or thrift institutions	0		\$ 0
(d) Investment companies	18		\$ 4,277,720,230
(e) Business development companies	0	1	\$ 0
(f) Pooled investment vehicles (other than investment companies and business development companies)	10		\$ 721,654,112
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	129		\$ 4,434,050,540
(h) Charitable organizations	148		\$ 1,639,755,648
(i) State or municipal <i>government entities</i> (including government pension plans)	50		\$ 2,049,738,046
(j) Other investment advisers	37		\$ 1,515,930,458
(k) Insurance companies	15		\$ 2,170,656,689
(I) Sovereign wealth funds and foreign official institutions	0		\$ 0
(m) Corporations or other businesses not listed above	87		\$ 803,433,335
(n) Other: UNION PENSION HEALTH & WELFARE PLANS	45		\$ 976,577,854

Compensation Arrangements

E.	You are co	mpensated for your investment advisory services by (check all that apply):
	▽ (1)	A percentage of assets under your management

(2) Hourly charges

(3) Subscription fees (for a newsletter or periodical)

Fixed fees (other than subscription fees)

(5) Commissions

(6) Performance-based fees

(7) Other (specify):

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

Regulatory Assets Under Management

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?

U.S. Dollar Amount

Total Number of Accounts

Discretionary:

(a) \$ 25,590,363,809

(d) 5,017

Non-Discretionary:

(b) \$52,409,927

(e) 17

Total:

(c) \$ 25,642,773,736

(f) 5,034

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?

\$ 72,458,361

Item 5 Information About Your Advisory Business - Advisory Activities

Advisory Activities

- G. What type(s) of advisory services do you provide? Check all that apply.
 - (1) Financial planning services
 - ∇ Portfolio management for individuals and/or small businesses
 - **(**3) Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940)
 - V Portfolio management for pooled investment vehicles (other than investment companies) (4)
 - $\overline{\mathbf{v}}$ Portfolio management for businesses (other than small businesses) or institutional clients (other than registered investment companies and other pooled investment vehicles)

	(6) Pension consulting services ✓ (7) Selection of other advisers (including private fund managers) ☐ (8) Publication of periodicals or newsletters ☐ (9) Security ratings or pricing services ☐ (10) Market timing services ☐ (11) Educational seminars/workshops ☐ (12) Other(specify):		
	Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment coregistered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 8 of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedule D.		ber
Н.	If you provide financial planning services, to how many <i>clients</i> did you provide these services during your last fiscal year?		
	1 10		
	C 1-10 C 11-25		
	C 26 - 50		
	C 51 - 100		
	C 101 - 250		
	© 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 separadvisory relationship with those investors.	ırate	
_		Yes	No
I.	(1) Do you participate in a <i>wrap fee program</i> ?	⊙	О
	(2) If you participate in a <i>wrap fee program</i> , what is the amount of your regulatory assets under management attributable to act	ing as:	
	(a) sponsor to a wrap fee program \$ 0		
	(b) portfolio manager for a <i>wrap fee program</i> ? \$ 448,665,400		
	(c) <i>sponsor</i> to and portfolio manager for the same <i>wrap fee program</i> ? \$ 0		
	If you report an amount in Item 5.I.(2)(c), do not report that amount in Item 5.I.(2)(a) or Item 5.I.(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 5.I.(2) of Schedule D.	Section	
	If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual is offered through a wrap fee program, do not check Item $5.I.(1)$ or enter any amounts in response to Item $5.I.(2)$.		
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	Yes	No ⊙
	limited types of investments?		·
	(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	0
K.	Separately Managed Account <i>Clients</i>	V	N.
	(1) Do you have regulatory assets under management attributable to <i>clients</i> other than those listed in Item 5.D.(3)(d)-(f)	Yes	_
	(1) Do you have regulatory assets under management attributable to <i>chemis</i> other than those listed in Item 5.D.(3)(d)-(1) (separately managed account <i>clients</i>)?	•	0
	If yes, complete Section 5.K.(1) of Schedule D.		
	(2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise?	О	\odot
	If yes, complete Section 5.K.(2) of Schedule D.		

	(3) Do you engage in derivative transactions on behalf of any of the separately managed account <i>clients</i> that you advise? If yes, complete Section 5.K.(2) of Schedule D.	•	0
	(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? If yes, complete Section 5.K.(3) of Schedule D for each custodian.	•	o
L.	Marketing Activities	W	N I -
	(1) Do any of your <i>advertisements</i> include:	Yes	No
	(a) Performance results?	•	c
	(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))?	c	•
	(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	c	•
	(e) Third-party ratings?	©	c
	(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> ?	o	•
	(3) Do any of your advertisements include hypothetical performance ?	•	О
	(4) Do any of your advertisements include predecessor performance ?	©	c

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

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

SEC File Number 811 - 03373

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

Series ID	Parallel Managed Account Regulatory assets under management
S000006744	\$ 34,095,540
S000006748	\$ 14,433,311
S000006753	\$ 231,584,582
S000041250	\$ 5,217,965,167
S000041251	\$ 1,780,809,240
S000043443	\$ 455,356,839
S000050604	\$ 474,211,453
S000063758	\$ 471,502,695
S000065430	\$ 90,411,468
S000067438	\$ 537,837,979

SEC File Number 811 - 0383301

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

5		Parallel Managed Account Regulatory assets under management
9	S000033926	\$ 391,890,929

SEC File Number

811 - 07763

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

	Parallel Managed Account Regulatory assets under management
S000068190	\$ 216,453,011

SEC File Number

811 - 22127

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

	Parallel Managed Account Regulatory assets under management
S000019853	\$ 2,027,916,305

SECTION 5.I.(2) Wrap Fee Programs

If you are a portfolio manager for one or more *wrap fee programs*, list the name of each program and its *sponsor*. You must complete a separate Schedule D Section 5.I.(2) for each *wrap fee program* for which you are a portfolio manager.

Name of Wrap Fee Program

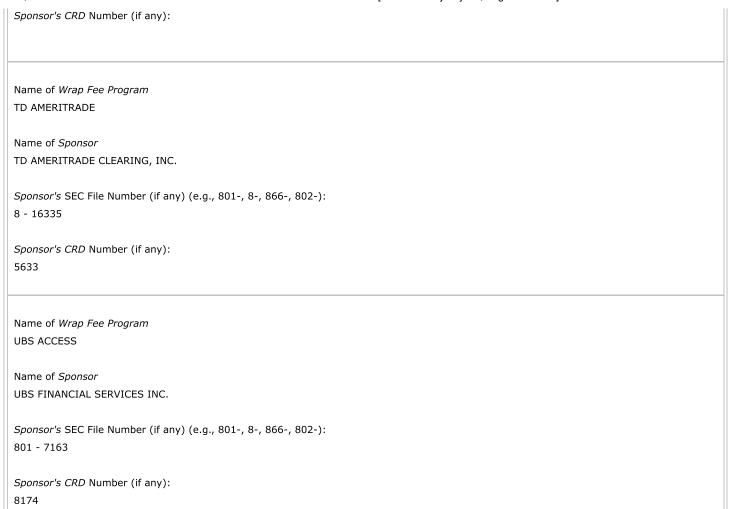
CHARLES SCHWAB MANAGED ACCOUNT ACCESS PROGRAM

Name of Sponsor

CHARLES SCHWAB

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 ASSET MANAGEMENT
Name of Sponsor
ENVESTNET ASSET 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
LOCKWOOD MANAGED ACCOUNT ADVISORS PROGRAM
Name of Sponsor
LOCKWOOD ADVISORS, 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
LPL BANK WEALTH PROGRAM (BWP)
Name of Sponsor
LPL FINANCIAL LLC
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
801 - 10970
Sponsor's CRD Number (if any):
6413
Name of Wrap Fee Program
MORGAN STANLEY INSTITUTIONAL CONSULTING SERVICES PROGRAM
Name of Sponsor
MORGAN STANLEY
Sponsor's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):
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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.

(a)	Asset Type		Mid-year	End of year
	(i)	Exchange-Traded Equity Securities	47 %	47 %
	(ii)	Non Exchange-Traded Equity Securities	0 %	0 %
	(iii)	U.S. Government/Agency Bonds	14 %	12 %
	(iv)	U.S. State and Local Bonds	8 %	8 %

(v)	Sovereign Bonds	0 %	0 %
(vi)	Investment Grade Corporate Bonds	20 %	20 %
(vii)	Non-Investment Grade Corporate Bonds	2 %	2 %
(viii)	Derivatives	0 %	0 %
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	4 %	4 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	0 %	0 %
(xi)	Cash and Cash Equivalents	4 %	4 %
(xii)	Other	1 %	3 %

Generally describe any assets included in "Other"

Asse	et Type	End of year
(i)	Exchange-Traded Equity Securities	%
(ii)	Non Exchange-Traded Equity Securities	%
(iii)	U.S. Government/Agency Bonds	%
(iv)	U.S. State and Local Bonds	%
(v)	Sovereign Bonds	%
(vi)	Investment Grade Corporate Bonds	%
(vii)	Non-Investment Grade Corporate Bonds	%
(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"

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

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

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

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

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

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

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

You may, but are not required to, complete the table with respect to any separately managed account with regulatory assets under

[&]quot;OTHER" INCLUDES DEBT INSTRUMENTS NOT FITTING INTO THE CLASSIFICATIONS PROVIDED (I.E., CMO AND ABS) AND FORWARD CURRENCY FORWARDS.

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	Exposures		
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative		(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$ 83,838,767	\$	%	1 %	%	%	%	%
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						
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative		(d) <i>Equity</i> Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$ 107,696,452	\$	%	1 %	%	%	%	%
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.

SECTION 5.K.(3) Custodians for Separately Managed Accounts

	plete a separate Schedule D Section 5.K.(3) fo ount regulatory assets under management.	r each custodian that holds te	n percent or more of your aggreg	ate separately managed
(a)	Legal name of custodian:			
()	CHARLES SCHWAB & CO., INC.			
(b)	Primary business name of custodian:			
	CHARLES SCHWAB & CO., INC.			
(c)	The location(s) of the custodian's office(s) resp	oonsible for <i>custody</i> of the ass	ets:	
	City:	State:	Country:	
	SAN FRANCISCO	California	United States	
				Yes No
(d)	Is the custodian a <i>related person</i> of your firm?	,		0.6
(a)	If the custodian is a broker-dealer, provide its	SEC registration number (if as	nv)	0.0
(0)	8 - 16514	SEC registration number (if ar	'Y)	
(f)	If the custodian is not a broker-dealer, or is a l (if any)	broker-dealer but does not ha	ve an SEC registration number, pi	rovide its legal entity identifier
(a)	What amount of your regulatory assets under	management attributable to s	eparately managed accounts is he	eld at the custodian?
(9)	\$ 4,141,316,088	management attributable to s	oparatory managed accounts is no	sia de eno custouian.
	+ ·,- ·-,- ·-,- ·,- ·			
(2)	Legal name of custodians			
(a)	Legal name of custodian: NORTHERN TRUST SECURITIES, INC.			
(h)	Primary business name of custodian:			
(5)	NORTHERN TRUST SECURITIES, INC.			
(c)	The location(s) of the custodian's office(s) resp	oonsible for <i>custody</i> of the ass	ets :	
(-)		State:	Country:	
	·	Illinois	United States	
				Yes No
(d)	Is the custodian a <i>related person</i> of your firm?)		
				0.0
(e)	If the custodian is a broker-dealer, provide its	SEC registration number (if ar	ny)	
(6)	8 - 23689			ida iba lagal ambib i danbisian
(1)	If the custodian is not a broker-dealer, or is a l (if any)	proker-dealer but does not na	ve an SEC registration number, pi	ovide its legal entity identiller
(q)	What amount of your regulatory assets under	management attributable to s	eparately managed accounts is he	eld at the custodian?
(3)	\$ 3,469,315,871			
(a)	Legal name of custodian:			
(4)	CHARLES SCHWAB & CO., INC.			
(b)	Primary business name of custodian:			
(-)	CHARLES SCHWAB & CO., INC.			
(c)	The location(s) of the custodian's office(s) resp	oonsible for <i>custody</i> of the ass	ets :	
. ,	City:	State:	Country:	
	LONE TREE	Colorado	United States	
				Yes No
(4)	Is the custodian a <i>related person</i> of your firm?)		
	·			0 ⊚
(e)	If the custodian is a broker-dealer, provide its $8 - 16514$	SEC registration number (if ar	ny)	

- (f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)
- (g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? \$ 1,938,228,185

JI Z Z ,	1.01 /	With Sections [eser Name: jsanjuan, Orgid: 100000]				
Iten	1 6 O	ther Business Activities				
In th	nis Ite	m, we request information about your firm's other business activities.				
A.	If 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):	f			
	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)?	œ			
	(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.	Č			
		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	rion	6.A. Names of Your Other Businesses				
		No Information Filed				
SEC	ΓΙΟΝ	6.B.(2) Description of Primary Business				
		your primary business (not your investment advisory business):				
If yo	ou en	gage in that business under a different name, provide that name:				
SEC	ΓΙΟΝ	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 yo	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*.

inte	rest may oc	cur between you and your <i>clients</i> .
A.	-	of Item 7 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates. Your <i>related persons</i> your <i>advisory affiliates</i> and any <i>person</i> that is under common <i>control</i> with you.
	You have a	a related person that is a (check all that apply):
	(1) (2)	broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered) other investment adviser (including financial planners)
	☐ (3) ☐ (4) ☐ (5)	registered municipal advisor registered security-based swap dealer major security-based swap participant
	(6) (7)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant
	□ (8) □ (9)	banking or thrift institution trust company
	☐ (10) ☐ (11)	accountant or accounting firm lawyer or law firm
	[(12)	insurance company or agency
	_ ` ´	pension consultant real estate broker or dealer
	L (15)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

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

 $oldsymbol{arEpsilon}$ (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

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

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

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

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

SECTION 7.A. Financial Industry Affiliations

No Information Filed

Item 7 Private Fund Reporting

Yes No

B. Are you an adviser to any private fund?

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

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

SECTION	7.B.(1)	Private	Fund	Reportir	ŀ
					_

	Funds per Page: 15 ✔ Total Funds: 7		
A. F	PRIVATE FUND		
Inf	formation About the <i>Private Fund</i>		
1.	 (a) Name of the private fund: INTERNATIONAL SMALL-CAP EQUITY FUND LLLP (b) Private fund identification number: (include the "805-" prefix also) 805-7851370930 		
2.	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country: Colorado United States		
3.	Name of General Partner, Manager, Trustee, or Director		
	LWF, INC.		
	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this priva	ate fu	ınd.
	No Information Filed		
	 ✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company 1940 ✓ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company 1940 		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
		Yes	No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	O	\odot
	(b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?		
	No Information Filed		
		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	⊚
	(d) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invest Name of private fund:	ts?	
	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 Schedul Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	e D,	
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 1. for each of the feeder funds answer the following questions:	on 7.	В.

No Information Filed

	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substall of its assets in a single master fund.		
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	О	•
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	d	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	О	0
		Yes	No
€.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	0
10.	What type of fund is the <i>private fund</i> ?		
	$^{f C}$ hedge fund $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital fund private fund: INVESTING IN & TRADING IN INTERNATIONAL SMALL-CAP EQUITY INVESTMENTS	⊙ Oth	ner
	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> : \$ 14,962,310		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 1,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount in the organizational documents of the fund).	set foi	rth
13.	Approximate number of the <i>private fund's</i> beneficial owners:		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes C	No ⊙
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
<u>Yοι</u>	ur Advisory Services		
17	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	No
±/.	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i>. answer to question 17.(a) is "no," leave this question blank.	C If the	•
	No Information Filed		

18. (a)			
	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	0	⊚
(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the protection 18.(a) is "no," leave this question blank.	ivate fur	nd. If
	No Information Filed		
		Ye	s No
19. Are	e your <i>clients</i> solicited to invest in the <i>private fund</i> ?	•	0
NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20. App	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Private</u>	e Offering		
	s the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act 33?		s No
22. If y	yes, provide the <i>private fund's</i> Form D file number (if any):		
Fo	orm D file number		
02	21-131938		
B. SERV	ICE PROVIDERS rs		
22 (-)	(1) Are the private fundle financial statements subject to an appual sudit?	Ye	s No
23. (a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?		
		⊙	0
(_,	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	o	o
(=)		o	o
()	(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	o	o
	(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 auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	than or	o
	(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 auditing firm, 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 or	o
	(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 auditing firm, 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:	than or	o
	(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 auditing firm, 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:	than or	o
	(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 auditing firm, 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):	than or	O
	(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 auditing firm, 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:	than or	O
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more auditing firm, 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 private fund 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 private fund's audit (city, state and country): City: State: Country: CLEVELAND Ohio United States	than or	No
	(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 auditing firm, 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 (d) Is the auditing firm an <i>independent public accountant</i> ?	than or	No C

(g) Are the *private fund's* audited financial statements for the most recently completed fiscal year distributed to the *private*https://crd.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG_PK=1615473

 \odot \circ

fund's investors?

	unqualified opinions?	by the additing him for the private	runa since your last annual updating amendment col	itaiii
	⊙ Yes ○ No ○ Report Not Y	et Received		
	If you check "Report Not Yet F the report is available.	Received," you must promptly file an	n amendment to your Form ADV to update your respo	onse when
Prime Bı	roker			., .,
.4. (a)	Does the <i>private fund</i> use one	or more prime brokers?		Yes No
	•) through (e) below for each prime broker the <i>private</i> implete questions (b) through (e) separately for each	e fund uses.
		No Inform	nation Filed	
Custodia 25. (a)		custodians (including the prime br	okers listed above) to hold some or all of its assets?	Yes No
. ,	If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fu</i> te questions (b) through (g) separately for each cust	
	Additional Custodian Infor	mation: 1 Record(s) Filed.		
		re than one custodian, you must cor n:	(b) through g) below for each custodian the private f nplete questions (b) through (g) separately for each	
	(c) Primary business name BROWN BROTHERS HAI			
	(d) The location of the cust	odian's office responsible for <i>custoc</i>	ly of the <i>private fund's</i> assets (city, state and country	·):
	City:	State:	Country:	
	BOSTON	Massachusetts	United States	Yes No
	(e) Is the custodian a <i>relat</i>	ed person of your firm?		0 0
	(f) If the custodian is a bro	oker-dealer, provide its SEC registra	tion number (if any):	
	- CRD Number (if any):			
	(g) If the custodian is not a legal entity identifier (if	•	r but does not have an SEC registration number, prov	/ide its
dminis	<u>trator</u>			Yes No
.6. (a)	Does the <i>private fund</i> use an	administrator other than your firm?		@ O
		a) is "yes," respond to questions (b lete questions (b) through (f) separ) through (f) below. If the <i>private fund</i> uses more that ately for each administrator.	~ ~

		Additional Administrati	or information : 1 Record(s)	riieu.						
		If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses n administrator, you must complete questions (b) through (f) separately for each administrator.								
		(b) Name of administra	tor: NT PRIVATE FUND SOLUTIONS							
		(c) Location of adminis	trator (city, state and country):							
		City:	State:	Country: United States						
		DENVER	Colorado	United States	Yes No					
		(d) Is the administrator	a related person of your firm?		C 0					
				ccount statements to the <i>private fund's</i> investors?						
		• Yes (provided to investors)	all investors) $f C$ Some (provided	to some but not all investors) igcirc No (provided to no						
			tors? If investor account stateme	who sends the investor account statements to the (rest of the) private fund's invest						
Ma	obta	ining any relevant quotes, ulations (including allocatio	` '	e valuation procedure established for that asset, if any, in urposes of investor subscriptions, redemptions or distribuded by such <i>person</i> .	-					
					Yes No					
28.	(a)	Does the <i>private fund</i> use	the services of someone other the	han you or your <i>employees</i> for marketing purposes?	o ⊙					
		solicitor, or similar <i>person</i>	. If the answer to question 28.(a uses. If the <i>private fund</i> uses m	ment agent, consultant, finder, introducer, municipal adv) is "yes," respond to questions (b) through (g) below for ore than one marketer you must complete questions (b)	each such					
			No	Information Filed						
A. P	RIVAT	E FUND								
Info	ormat	ion About the Private F	<u>und</u>							
1.	(a)	Name of the <i>private fund</i> :								
		SBH GLOBAL DISCOVERY	FUND, LLC							
	` ,	<i>Private fund</i> identification (include the "805-" prefix								
		805-7333602201								
2.	Unde	er the laws of what state o	r country is the <i>private fund</i> orga	anized:						

Country:

United States

State:

Delaware

	General Partner, Manager, Trustee, or	Director
LWF INC.		
(b) If filin	g an umbrella registration identify the filir	g adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fun
(D) II IIIII	g an <i>umbrena registration</i> , identity the <i>imi</i>	. , , , , , , , , , , , , , , , , , , ,
		No Information Filed
Γhe <i>privat</i> ι	e fund (check all that apply; you must che	rk at least one):
-		of investment company under section 3(c)(1) of the Investment Company Act of
1940		
□ (2) qua	alifies for the exclusion from the definition	of investment company under section 3(c)(7) of the Investment Company Act o
1940		
ict the ne	me and sountmy in English of each foreign	Singuist was the with with which the private fixed is registered
	The and country, in English, of each <i>foreign</i>	n financial regulatory authority with which the private fund is registered. No Information Filed
		Yes
a) Is this	a "master fund" in a master-feeder arrang	roment?
		ication number (if any) of the feeder funds investing in this <i>private fund</i> ?
. , , ,	private fund	Private fund identification number
	BAL DISCOVERY FUND, LTD.	805-2254851637
	·	
		Yes
c) Is this	a "feeder fund" in a master-feeder arrang	ement?
d) If ves	what is the name and <i>private fund</i> identif	ication number (if any) of the master fund in which this <i>private fund</i> invests?
Name	of <i>private fund</i> :	
Private	e fund identification number:	
	e fund identification number: de the "805-" prefix also)	
(includ	de the "805-" prefix also) must complete question 6 for each maste	r-feeder arrangement regardless of whether you are filing a single Schedule D,
(includ	de the "805-" prefix also)	
(includ NOTE: You Section 7.E	de the "805-" prefix also) must complete question 6 for each maste B.(1) for the master-feeder arrangement o filing a single Schedule D, Section 7.B.(1)	r reporting on the funds separately. for a master-feeder arrangement according to the instructions to this Section 7.E
(includ NOTE: You Section 7.E	de the "805-" prefix also) I must complete question 6 for each maste B.(1) for the master-feeder arrangement o	r reporting on the funds separately. for a master-feeder arrangement according to the instructions to this Section 7.E
(include) NOTE: You Section 7.E If you are 1	de the "805-" prefix also) must complete question 6 for each maste B.(1) for the master-feeder arrangement o filing a single Schedule D, Section 7.B.(1)	r reporting on the funds separately. for a master-feeder arrangement according to the instructions to this Section 7.E
(include) NOTE: You Section 7.E If you are 1	de the "805-" prefix also) must complete question 6 for each maste B.(1) for the master-feeder arrangement o filing a single Schedule D, Section 7.B.(1) ch of the feeder funds answer the following	r reporting on the funds separately. for a master-feeder arrangement according to the instructions to this Section 7.E
(include) NOTE: You Section 7.E If you are (1), for each	must complete question 6 for each maste B.(1) for the master-feeder arrangement of filing a single Schedule D, Section 7.B.(1) ch of the feeder funds answer the following al Feeder Fund Information: 1 Record	r reporting on the funds separately. for a master-feeder arrangement according to the instructions to this Section 7.E
(include NOTE: You Section 7.E) If you are (1), for each	must complete question 6 for each maste B.(1) for the master-feeder arrangement of filing a single Schedule D, Section 7.B.(1) ch of the feeder funds answer the following al Feeder Fund Information: 1 Record	for a master-feeder arrangement according to the instructions to this Section 7.E g questions: (s) Filed. 3.(1) for a master-feeder arrangement according to the instructions to this
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(include NOTE: You Section 7. If you Section 7. If you Section 7. If you Section Section 1.	must complete question 6 for each master. B.(1) for the master-feeder arrangement of filing a single Schedule D, Section 7.B.(1) ch of the feeder funds answer the following al Feeder Fund Information: 1 Recordate are filing a single Schedule D, Section 7.1 on 7.B.(1), for each of the feeder funds an	for a master-feeder arrangement according to the instructions to this Section 7.E g questions: (s) Filed. 3.(1) for a master-feeder arrangement according to the instructions to this
(include NOTE: You Section 7. If you section 7. If you section (a)	In must complete question 6 for each master B.(1) for the master-feeder arrangement of filing a single Schedule D, Section 7.B.(1) ch of the feeder funds answer the following all Feeder Fund Information: 1 Recordate are filing a single Schedule D, Section 7.I on 7.B.(1), for each of the feeder funds an Name of the private fund: SBH GLOBAL DISCOVERY FUND, LTD.	r reporting on the funds separately. for a master-feeder arrangement according to the instructions to this Section 7.E g questions: (s) Filed. 3.(1) for a master-feeder arrangement according to the instructions to this
(include NOTE: You Section 7. If you Section 7. If you Section 7. If you Section Section 1.	de the "805-" prefix also) I must complete question 6 for each maste B.(1) for the master-feeder arrangement of filing a single Schedule D, Section 7.B.(1) ch of the feeder funds answer the following al Feeder Fund Information: 1 Recordary are filing a single Schedule D, Section 7.I on 7.B.(1), for each of the feeder funds an Name of the private fund: SBH GLOBAL DISCOVERY FUND, LTD. Private fund identification number:	for a master-feeder arrangement according to the instructions to this Section 7.E g questions: (s) Filed. 3.(1) for a master-feeder arrangement according to the instructions to this
(include NOTE: You Section 7. If you section 7. If you section (a)	in must complete question 6 for each master B.(1) for the master-feeder arrangement of filing a single Schedule D, Section 7.B.(1) choof the feeder funds answer the following al Feeder Fund Information: 1 Recorder are filing a single Schedule D, Section 7.I on 7.B.(1), for each of the feeder funds and Name of the private fund: SBH GLOBAL DISCOVERY FUND, LTD. Private fund identification number: (include the "805-" prefix also)	for a master-feeder arrangement according to the instructions to this Section 7.E g questions: (s) Filed. 3.(1) for a master-feeder arrangement according to the instructions to this
(include NOTE: You Section 7. If you section 7. If you section (a)	de the "805-" prefix also) I must complete question 6 for each maste B.(1) for the master-feeder arrangement of filing a single Schedule D, Section 7.B.(1) ch of the feeder funds answer the following al Feeder Fund Information: 1 Recordary are filing a single Schedule D, Section 7.I on 7.B.(1), for each of the feeder funds an Name of the private fund: SBH GLOBAL DISCOVERY FUND, LTD. Private fund identification number:	for a master-feeder arrangement according to the instructions to this Section 7.E g questions: (s) Filed. 3.(1) for a master-feeder arrangement according to the instructions to this
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(include NOTE: You Section 7. If you section 7. If you section (a)	the the "805-" prefix also) I must complete question 6 for each master B.(1) for the master-feeder arrangement of the feeder funds answer the following all Feeder Fund Information: 1 Record are filing a single Schedule D, Section 7.1 on 7.B.(1), for each of the feeder funds and Name of the private fund: SBH GLOBAL DISCOVERY FUND, LTD. Private fund identification number: (include the "805-" prefix also) 805-2254851637 Under the laws of what state or country State:	for a master-feeder arrangement according to the instructions to this Section 7.6 g questions: (s) Filed. 3.(1) for a master-feeder arrangement according to the instructions to this swer the following questions: (a) is the private fund organized: Country:
(include NOTE: You Section 7. If you Section 7. If you section (a)	In must complete question 6 for each master B.(1) for the master-feeder arrangement of filing a single Schedule D, Section 7.B.(1) ch of the feeder funds answer the following all Feeder Fund Information: 1 Record are filing a single Schedule D, Section 7.I on 7.B.(1), for each of the feeder funds and Name of the private fund: SBH GLOBAL DISCOVERY FUND, LTD. Private fund identification number: (include the "805-" prefix also) 805-2254851637 Under the laws of what state or country State:	for a master-feeder arrangement according to the instructions to this Section 7.19 questions: (s) Filed. 3.(1) for a master-feeder arrangement according to the instructions to this swer the following questions: (a) is the private fund organized: Country:

		IAMEC DADURA DIRECTOR		$-\parallel \parallel$		
		JAMES DADURA, DIRECTOR		$\parallel \parallel$		
		RALPH M. SEGALL, DIRECTOR				
(d) (2)		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				
	(0)	The private fund (check all that apply; you must check at least one);				
	(e) The <i>private fund</i> (check all that apply; you must check at least one): ✓ (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Company Act of 1940					
		\square (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investompany Act of 1940	stment			
	(f)	List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.				
		Name of Country/English Name of Foreign Financial Regulatory Authority		7		
		Other - CIMA CAYMAN ISLANDS MONETARY AUTHORITY				
	substantially purposes of t	urposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master factor is question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests subsets in a single master fund.				
			Yes	No		
8.	(a) Is this pr	rivate fund a "fund of funds"?	•	0		
	•	urposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pool rehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	led			
	(b) If yes, d	oes the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	О	⊙		
			Yes	No		
9.		last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•		
10.	What type of	fund is the <i>private fund</i> ?				
	$oldsymbol{\circ}$ hedge fund $oldsymbol{\circ}$ liquidity fund $oldsymbol{\circ}$ private equity fund $oldsymbol{\circ}$ real estate fund $oldsymbol{\circ}$ securitized asset fund $oldsymbol{\circ}$ venture capital fund $oldsymbol{\circ}$ Other private fund:					
	NOTE: For de	efinitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.				
11.	Current gross \$ 527,728	s asset value of the <i>private fund</i> :				
<u>Ow</u>	nershi <u>p</u>					
12.	Minimum inv	estment commitment required of an investor in the <i>private fund</i> :				
		t the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amoun zational documents of the fund).	it set fo	rth		
13.	Approximate 47	number of the <i>private fund's</i> beneficial owners:				
14.	What is the a	approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :				

15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	Yes ①	No C
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : %		
<u> Υοι</u>	ır Ac	dvisory Services	Yes	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	0	<u>@</u>
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . answer to question 17.(a) is "no," leave this question blank.		
		No Information Filed		
			Yes	No
18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	0	•
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private</i> the answer to question 18.(a) is "no," leave this question blank.	e func	1. If
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	\odot	\circ
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
	1%	oroximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? Offering		
			Yes	No
21.	Has 193	s the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 33?	0	О
22.		es, provide the <i>private fund's</i> Form D file number (if any):		
	-	rm D file number 1-199937		_
		CE PROVIDERS		
7101		<u>~</u>	Yes	No
23.	(a)	(1) Are the private fund's financial statements subject to an annual audit?	•	0
		(2) 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 that auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	n one	:
		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: PLANTE & MORAN, PLLC		

	11	City: State: Country:		
		CHICAGO Illinois United Sta	tes	
			Yes	No
	(d)	I) Is the auditing firm an independent public accountant?	•	$^{\circ}$
	(e)	e) Is the auditing firm registered with the Public Company Accounting Oversi	ght Board?	c
		If yes, Public Company Accounting Oversight Board-Assigned Number:		
	(f)) If "yes" to (e) above, is the auditing firm subject to regular inspection by t Oversight Board in accordance with its rules?	he Public Company Accounting	0
			Y	es No
		the <i>private fund's</i> audited financial statements for the most recently completed investors?	ed fiscal year distributed to the <i>private</i>	•
		all of the reports prepared by the auditing firm for the <i>private fund</i> since your ualified opinions?	last annual updating amendment contain	
	⊙ Ye	Yes C No C Report Not Yet Received		
	,	ou check "Report Not Yet Received," you must promptly file an amendment to report is available.	your Form ADV to update your response wh	ien
rime B	roker	<u>er</u>	v	es No
1. (a)	Does	s the <i>private fund</i> use one or more prime brokers?	''	
		ne answer to question 24.(a) is "yes," respond to questions (b) through (e) be private fund uses more than one prime broker, you must complete question ker.	·	ises.
	If the	ne private fund uses more than one prime broker, you must complete question	·	ises.
	If the broke	ne <i>private fund</i> uses more than one prime broker, you must complete question ker.	·	ises.
ustodia	If the broke	ne <i>private fund</i> uses more than one prime broker, you must complete question ker. No Information Filed	You had a some or all of its posses?	es No
ustodia 5. (a)	If the broke an Does If the	ne <i>private fund</i> uses more than one prime broker, you must complete question ker.	You we) to hold some or all of its assets?	es No
ustodia 5. (a)	If the broke Does If the the pr	ne private fund uses more than one prime broker, you must complete question cer. No Information Filed s the private fund use any custodians (including the prime brokers listed above answer to question 25.(a) is "yes," respond to questions (b) through (g) be	You we) to hold some or all of its assets?	es N
ustodia 5. (a)	If the broke Does If the pr Addi	ne private fund uses more than one prime broker, you must complete question cer. No Information Filed s the private fund use any custodians (including the prime brokers listed above an eanswer to question 25.(a) is "yes," respond to questions (b) through (g) be private fund uses more than one custodian, you must complete questions (b)	Ye) to hold some or all of its assets? elow for each custodian the <i>private fund</i> uses through (g) separately for each custodian.	es NO C
ustodia 5. (a)	If the broke Does If the property Addi	ne private fund uses more than one prime broker, you must complete question cer. No Information Filed s the private fund use any custodians (including the prime brokers listed above an eanswer to question 25.(a) is "yes," respond to questions (b) through (g) be private fund uses more than one custodian, you must complete questions (b) ditional Custodian Information: 1 Record(s) Filed. the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(b) through g) the answer to question 25.(c) is "yes," respond to questions (b) through g) the answer to question 25.(c) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer to question 25.(a) is "yes," respond to questions (b) through g) the answer through g) through g) through g) through g	Ye) to hold some or all of its assets? elow for each custodian the <i>private fund</i> uses through (g) separately for each custodian.	es NO C
ustodia 5. (a)	If the broke Does If the pr Addi If the (b)	ne private fund uses more than one prime broker, you must complete question cer. No Information Filed s the private fund use any custodians (including the prime brokers listed above the answer to question 25.(a) is "yes," respond to questions (b) through (g) be private fund uses more than one custodian, you must complete questions (b) ditional Custodian Information: 1 Record(s) Filed. the answer to question 25.(a) is "yes," respond to questions (b) through g) is the private fund uses more than one custodian, you must complete question (b) Legal name of custodian:	Ye) to hold some or all of its assets? elow for each custodian the <i>private fund</i> uses through (g) separately for each custodian.	es N C
ustodia 5. (a)	If the broke Does If the property Addition of the property Addition o	the private fund uses more than one prime broker, you must complete question teer. No Information Filed The private fund use any custodians (including the prime brokers listed above answer to question 25.(a) is "yes," respond to questions (b) through (g) be private fund uses more than one custodian, you must complete questions (b) ditional Custodian Information: 1 Record(s) Filed. The answer to question 25.(a) is "yes," respond to questions (b) through g) the private fund uses more than one custodian, you must complete question to be private fund uses more than one custodian, you must complete question. The private fund uses more than one custodian, you must complete question to be private fund uses more than one custodian, you must complete question. The private fund uses more than one custodian, you must complete question. The private fund uses more than one custodian, you must complete question. The private fund uses more than one custodian.	ye) to hold some or all of its assets? elow for each custodian the <i>private fund</i> uses through (g) separately for each custodian.	es NO C
ustodia 5. (a)	If the broke Does If the property Addition of the property Addition o	ne private fund uses more than one prime broker, you must complete question for. No Information Filed In the private fund use any custodians (including the prime brokers listed above the answer to question 25.(a) is "yes," respond to questions (b) through (g) be private fund uses more than one custodian, you must complete questions (b) ditional Custodian Information: 1 Record(s) Filed. The answer to question 25.(a) is "yes," respond to questions (b) through g) the private fund uses more than one custodian, you must complete question (b) Legal name of custodian: CIBC BANK US Primary business name of custodian: CIBC	ye) to hold some or all of its assets? elow for each custodian the <i>private fund</i> uses through (g) separately for each custodian.	es NO C

	(e) Is the custodian a <i>related person</i> of your firm?	0	⊙
	(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):		
	- CRD Number (if any):		
	(g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number legal entity identifier (if any)	r, provide its	
mini	strator		
		Yes	, N
(a)	Does the <i>private fund</i> use an administrator other than your firm? If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses m administrator, you must complete questions (b) through (f) separately for each administrator.	ore than one	(
	Additional Administrator Information: 1 Record(s) Filed.		
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses administrator, you must complete questions (b) through (f) separately for each administrator.	more than one	
	(b) Name of administrator: O'MALLEY & KWIT, LLC		
	(c) Location of administrator (city, state and country):		
	City: State: Country: CHICAGO Illinois United States		
		Yes No)
	(d) Is the administrator a <i>related person</i> of your firm?	0 0	
	(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?		
	(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (resprivate fund's investors? If investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund's investor account statements are not sent to the (rest of the) private fund sent to the (
	ing 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 is not your <i>related person</i> ?	an administrate	or,
obt	ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any sining any relevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distulations (including allocations) was the valuation determined by such <i>person</i> .	_	ee
rket	<u>ers</u>	Yes	, N
(a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	0	. (
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal a solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses more than one marketer you must complete questions (g) the private fund uses (g) the private fund (g) the pr	for each such	

No Information Filed

A. PRIVATE FUND

Information About the Private Fund

1. (a) Name of the private fund:

SEGALL BRYANT & HAMILL EMERGING MARKETS FUND, LP

(b) Private fund identification number:

(include the "805-" prefix also) 805-1333820975

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

State:

Country:

Delaware

United States

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

Name of General Partner, Manager, Trustee, or Director

LWF, INC.

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

No Information Filed

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

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

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

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

No Information Filed

Yes No

 \circ

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

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

Name of private fund	Private fund identification number
SEGALL BRYANT & HAMILL EMERGING MARKETS OFFSHORE FUND, LTD	805-7737893226

Yes No

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

 \circ

(d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests? Name of *private fund*:

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

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B. (1), for each of the feeder funds answer the following questions:

Additional Feeder Fund Information: 1 Record(s) Filed.

10.

	Name of the <i>private fund</i> :		
	SEGALL BRYANT & HAMILL EMERGING MARKETS OFFSHORE FUND, LTD.		
(b)	Private fund identification number:		
	(include the "805-" prefix also)		
	805-7737893226		
(c)	Under the laws of what state or country is the <i>private fund</i> organized:		
	State: Country: Cayman Islands		
(d) (1)	Name(s) of General Partner, Manager, Trustee or Directors (or <i>persons</i> serving in a similar capacity):		
	Name of General Partner, Manager, Trustee or Director		
	JAMES DADURA		_
	RALPH SEGALL		_
(d) (2)	If filing an <i>umbrella registration</i> , identify the <i>filing adviser</i> and/or <i>relying adviser(s)</i> that sponsor(s) or manager <i>private fund</i> :	(s) this	
	No Information Filed		
(e)	The <i>private fund</i> (check all that apply; you must check at least one):		
	\Box (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investormany Act of 1940	stment	
	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Act of 1940	stment	
(f)	List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> registered.	' is	
	Name of Country/English Name of Foreign Financial Regulatory Authority		
	Cayman Islands - Cayman Islands Monetary Authority		
-	irposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master f his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substs in a single master fund.	stantial Yes	ly
oses of t its asse	ivate fund a "fund of funds"?		
oses of to its asse is this <i>pi</i>	rivate fund a "fund of funds"?	O bel	
its asse s this pi F: For pu	irposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pool ehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
its asse s this pi F: For pu	irposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pool		
its asse its this pi is this pi is: For pu tment v	irposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pool ehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. Does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	led	
oses of the session o	irposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pool ehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	led O	
oses of the session o	arposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pool ehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. Does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ? The asset of this question only, answer "yes" if the fund invest in securities issued by investment companies registered under the	C Yes	

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> :		
	\$ 91,607,551		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 1,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount sin the organizational documents of the fund).	set for	th
13.	Approximate number of the <i>private fund's</i> beneficial owners:		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 0%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	O	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
<u> Υοι</u>	<u>ır Advisory Services</u>	Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	•
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . answer to question 17.(a) is "no," leave this question blank.	If the	
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	O	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private</i> the answer to question 18.(a) is "no," leave this question blank.	e fund	. If
	No Information Filed		
		Yes	No
19.	Are your clients solicited to invest in the private fund? NOTE: For purposes of this question, do not consider feeder funds of the private fund.	⊙	0
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
Priv	vate Offering	Yes	No
21.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	0	С
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-316522		

/22, 7:57 A	IARD - All Sections [User Name: jsanjuan, OrgID: 106505]			
B. SERVI	ICE PROVIDERS			
Auditor	<u>^s</u>			
22 (-)	(4) And the private for the first in the terror the subject to an appeal and the	Ye	es	No
23. (a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	6)	0
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	6)	О
	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 the auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	nan o	ne	
	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.	<u> </u>		
	(b) Name of the auditing firm:			
	PLANTE & MORAN, PLLC			
	(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:			
	CHICAGO Illinois United States	Yes	N.	
	(d) Is the auditing firm an independent public accountant?	o ⊙	С	
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	c	,
	If yes, Public Company Accounting Oversight Board-Assigned Number:			
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	c	,
			es	N.
(g)	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?			O
(h)	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contaunqualified opinions?	ain		
	● Yes C No C Report Not Yet Received			
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your respont the report is available.	se wh	ien	
<u>Prime E</u>	<u>3roker</u>			
		Ye	es	No
24. (a)	Does the <i>private fund</i> use one or more prime brokers?	C)	\odot
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fi</i> . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each p		ises	.

<u>Custodian</u>

broker.

Yes No

25. (a) Does the *private fund* use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the private fund uses. If

No Information Filed

the private fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian.

Additional Custodian Information: 1 Record(s) Filed.

		es more than one custodian, you m	estions (b) through g) below for each custodian the <i>priv</i> nust complete questions (b) through (g) separately for e	
(b)	Legal name of cu BROWN BROTHER	stodian: RS HARRIMAN & CO.		
(c)		name of custodian: RS HARRIMAN & CO.		
(d)	The location of th	ne custodian's office responsible for	custody of the private fund's assets (city, state and co	untry):
	City: BOSTON	State: Massachusetts	Country: United States	
	BOSTON	Massachusetts	Officed States	Yes
(e)	Is the custodian a	a related person of your firm?		0
(f)	If the custodian is	s a broker-dealer, provide its SEC re	egistration number (if any):	
	- CRD Number (if a	any):		
(g)	If the custodian is		r-dealer but does not have an SEC registration number,	provide its
If the	the <i>private fund</i> u		ions (b) through (f) below. If the <i>private fund</i> uses mor	Yes •• than one
Does If the admii	the <i>private fund</i> u answer to questionistrator, you must	n 26.(a) is "yes," respond to questi complete questions (b) through (f	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator.	•
Does If the admir	the <i>private fund</i> u answer to questionistrator, you must	n 26.(a) is "yes," respond to questic complete questions (b) through (f)	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator. Filed.	re than one
Does If the admir Addi	the private fund us answer to questionistrator, you must itional Administrational Administr	ator Information: 1 Record(s) Ition 26.(a) is "yes," respond to question ator Information: 1 Record(s) Ition 26.(a) is "yes," respond to que	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator.	re than one
Does If the admin Addi If t adr	the private fund us answer to questionistrator, you must itional Administrational Administr	an 26.(a) is "yes," respond to questic complete questions (b) through (f) ator Information: 1 Record(s) I tion 26.(a) is "yes," respond to questions (b) through trator:	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator. Filed. estions (b) through (f) below. If the <i>private fund</i> uses more	re than one
Does If the admin Addi If t adr (b)	the private fund used answer to question inistrator, you must itional Administrational Administrator, you must ministrator, you must be answer to quest ministrator, you must be a self-self-self-self-self-self-self-self-	an 26.(a) is "yes," respond to questic complete questions (b) through (f) ator Information: 1 Record(s) I tion 26.(a) is "yes," respond to questions (b) through trator:	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator. Filed. estions (b) through (f) below. If the <i>private fund</i> uses more	re than one
Does If the admin Addi If t adr (b)	the private fund use answer to questionistrator, you must itional Administrational Administrator, you must be answer to questionistrator, you must be answer to questionistrator.	an 26.(a) is "yes," respond to questic complete questions (b) through (f) ator Information: 1 Record(s) I tion 26.(a) is "yes," respond to question to complete questions (b) through trator:	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator. Filed. estions (b) through (f) below. If the <i>private fund</i> uses more) (f) separately for each administrator. Country:	re than one
Does If the admin Addi If t adr (b)	the private fund used answer to question istrator, you must itional Administration the answer to question in the answer to	an 26.(a) is "yes," respond to questic complete questions (b) through (f) ator Information: 1 Record(s) I tion 26.(a) is "yes," respond to quests complete questions (b) through trator: VICES, INC.	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator. Filed. estions (b) through (f) below. If the <i>private fund</i> uses more) (f) separately for each administrator.	re than one
Does If the admin Addi If t adr (b)	the private fund use answer to questionistrator, you must itional Administrational Administration of administrator, you must sell GLOBAL SER' Location of administrator.	an 26.(a) is "yes," respond to questic complete questions (b) through (f) ator Information: 1 Record(s) I tion 26.(a) is "yes," respond to quests complete questions (b) through trator: VICES, INC. histrator (city, state and country): State:	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator. Filed. estions (b) through (f) below. If the <i>private fund</i> uses more) (f) separately for each administrator. Country:	re than one
Does If the admin Addi If t adr (b) (c)	the private fund used answer to questionistrator, you must itional Administrational Administration answer to questionistrator, you must be answer to questionistrator, you must be administrator. SEI GLOBAL SER' Location of admiricity: OAKS Is the administrational control of the administrator.	ator Information: 1 Record(s) Interest to the complete questions (b) through (f) ator Information: 1 Record(s) Interest to the complete questions (b) through the complete questions (b) through the complete questions (b) through the complete questions (c) through the complete questions (b) through the complete questions (b) through the complete questions (c) through the complete questions (d) throug	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator. Filed. estions (b) through (f) below. If the <i>private fund</i> uses more) (f) separately for each administrator. Country:	re than one
Does If the admin Addi If t adr (b) (c)	the private fund use answer to question istrator, you must itional Administration he answer to question in the answer to question in the answer to question in the administrator, you must sell GLOBAL SER's Location of admir City: OAKS Is the administration of the administrator the administrator the administration of the adminis	an 26.(a) is "yes," respond to questic complete questions (b) through (f) ator Information: 1 Record(s) I tion 26.(a) is "yes," respond to quests complete questions (b) through trator: VICES, INC. histrator (city, state and country): State: Pennsylvania tor a related person of your firm?	ions (b) through (f) below. If the <i>private fund</i> uses more) separately for each administrator. Filed. estions (b) through (f) below. If the <i>private fund</i> uses more (f) separately for each administrator. Country: United States	re than one

27.	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 administrate that is not your <i>related person</i> ? 100%	or,
	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 for calculations (including allocations) was the valuation determined by such <i>person</i> .	ee
Mar	<u>rketers</u>	
28	Yes (a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	_
20.	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.	•
	No Information Filed	
A. PF	RIVATE FUND	
<u>Info</u>	ormation About the <i>Private Fund</i>	
1.	(a) Name of the <i>private fund</i> :	
	SEGALL BRYANT & HAMILL EMERGING MARKETS SMALL CAP FUND, LP	
	(b) Private fund identification number:	
	(include the "805-" prefix also)	
	805-3756321471	
2.	Under the laws of what state or country is the private fund organized:	
۷.	Under the laws of what state or country is the <i>private fund</i> organized: State: Country:	
	Delaware United States	
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):	
	Name of General Partner, Manager, Trustee, or Director	
	LWF, INC	
	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fu	ınd.
	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	of
	\Box (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940	of
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.	
	No Information Filed	
	Yes	No
6.	(a) Is this a "master fund" in a master-feeder arrangement?	•
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?	***
	No Information Filed	

		Yes	No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0	•
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> involved Name of <i>private fund</i> :	ests?	
	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 Scheol Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.	dule D,	
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Se (1), for each of the feeder funds answer the following questions:	ction 7	.В.
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" purposes of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substall of its assets in a single master fund.	stantiall	ly
8.	(a) Is this <i>private fund</i> a "fund of funds"?	Yes	
0.	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pool investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	ed C	⊚
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	О	O
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	•	O
10.	What type of fund is the <i>private fund</i> ?		
	C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital fund private fund: INVESTING IN & TRADING EMERGING MARKETS SMALL CAP INVESTMENTS	⊙ Otl	her
	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> : \$ 4,388,446		
<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 1,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount in the organizational documents of the fund).	. set 10	ıcıı
13.	Approximate number of the <i>private fund's</i> beneficial owners: 7		
14.	What 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:		
	0 70		Yes	Nο
		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	•
16.	Wha	t is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
<u>You</u>	ur Ad	<u>visory Services</u>		
			Yes	No
17.		Are you a subadviser to this <i>private fund</i> ?	\circ	\odot
		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> . answer to question 17.(a) is "no," leave this question blank.	If the	
		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</i> fund?	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</i> the answer to question 18.(a) is "no," leave this question blank.	func	/. If
		No Information Filed		
			Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private fund</i> ?	\odot	\circ
	NOT	E: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Appı 0%	roximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Pri</u>	vate	Offering Control of the Control of t	V	N I -
21.	Has 1933	the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 3?	Yes	C
22.	If ye	es, provide the <i>private fund's</i> Form D file number (if any):		
	For	m D file number		
	021	-261054		
B. S	ERVIC	CE PROVIDERS		
Aud	ditors			
22	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?	Yes	No
25.	. ,	(2) 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 private fund uses more tha	n one	
		auditing firm, 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:		
		PLANTE & MORAN, PLLC		
		(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:				
		CHICAGO	Illinois	United States				
			Yes	No				
	(d)	(d) Is the auditing firm an independent public accountant?						
	(e)	Is the auditing firm	n registered with the Public Compan	y Accounting Oversight Board?	•	0		
		If yes, Public Com	pany Accounting Oversight Board-As	ssigned Number:				
		166						
	(f)		ve, is the auditing firm subject to re- a accordance with its rules?	gular inspection by the Public Company Accounting	•	0		
					Υє	es No	5	
(g)		ne <i>private fund's</i> au s investors?	dited financial statements for the mo	ost recently completed fiscal year distributed to the <i>private</i>	•	0 0)	
(h)		of the reports prepalified opinions?	ared by the auditing firm for the <i>pri</i>	ivate fund since your last annual updating amendment cont	ain			
	⊙ Ye	s C No C Report	Not Yet Received					
		rcheck "Report Not eport is available.	Yet Received," you must promptly f	ile an amendment to your Form ADV to update your respor	ise wh	ien		
<u>Prime</u>	Broker							
24. (a)	Does	the <i>private fund</i> us	e one or more prime brokers?		Ye	es No		
,	If the	answer to question	24.(a) is "yes," respond to question	ns (b) through (e) below for each prime broker the <i>private</i>				
	If the broke	•	nore than one prime broker, you mu	ist complete questions (b) through (e) separately for each	orime			
			No Ir	nformation Filed				
							_	
Custod	<u>ian</u>				٧z	es No	•	
25. (a)	Does	the <i>private fund</i> us	e any custodians (including the prim	e brokers listed above) to hold some or all of its assets?	(
,	If the	answer to question	25.(a) is "yes," respond to question	ns (b) through (g) below for each custodian the <i>private fun</i> mplete questions (b) through (g) separately for each custo	d uses			
	Addi	tional Custodian	Information: 1 Record(s) Filed.				1	
		•		ions (b) through g) below for each custodian the <i>private fu</i> st complete questions (b) through (g) separately for each c				
	(b) Legal name of custodian: BROWN BROTHERS HARRIMAN & CO. (c) Primary business name of custodian: BROWN BROTHERS HARRIMAN & CO.							
	(d)	The location of the	custodian's office responsible for <i>cu</i>	ustody of the private fund's assets (city, state and country)	:			
		City: BOSTON	State: Massachusetts	Country: United States				
			Hassachasetts	omica states	Yes	No		
	(e)	Is the custodian a	related person of your firm?		0	•		
							H.	

CRD Number (if any): (g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if any)
,
dministrator
Yes
5. (a) Does the <i>private fund</i> use an administrator other than your firm?
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.
Additional Administrator Information : 1 Record(s) Filed.
If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator, you must complete questions (b) through (f) separately for each administrator.
(b) Name of administrator: ULTIMUS FUND SOLUTIONS
(c) Location of administrator (city, state and country):
City: State: Country: CINCINNATI Ohio United States
Yes No
(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?
• Yes (provided to all investors) • Some (provided to some but not all investors) • No (provided to no investors)
(f) If the answer to question 26.(e) is "no" or "some," who sends the investor account statements to the (rest of the) private fund's investors? If investor account statements are not sent to the (rest of the) private fund's investors, respond "not applicable."
. 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 not your <i>related person</i> ? 100%
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> .
<u>rketers</u> Yes
(a) Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?
You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor, or similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private fund</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.
No Information Filed
d.finra.org/lad/Content/PrintHist/Adv/Sections/crd_iad_AdvAllSections.aspx?RefNum=&viewChanges=N&FLNG_PK=1615473

A. PF	RIVATE FUND
<u>Info</u>	rmation About the <i>Private Fund</i>
1.	 (a) Name of the <i>private fund</i>: SEGALL BRYANT & HAMILL INTERNATIONAL FUND, LP (b) <i>Private fund</i> identification number: (include the "805-" prefix also) 805-3272498692
2.	Under the laws of what state or country is the <i>private fund</i> organized: State: Country: Delaware United States
3.	(a) Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):
	Name of General Partner, Manager, Trustee, or Director
	LWF, INC.
	(b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.
	No Information Filed
5.	(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 List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.
٠.	No Information Filed
	Yes No
6.	(a) Is this a "master fund" in a master-feeder arrangement?
	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?
	No Information Filed
	THE THIS HIGHER THIS
	Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?
	Name of private fund:
	Private fund identification number: (include the "805-" prefix also)
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B. (1), for each of the feeder funds answer the following questions:
	No Information Filed

18.	(a)	Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private</i> fund?	Yes O	No
		No Information Filed		
		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> . answer to question 17.(a) is "no," leave this question blank.	If the	<u>;</u>
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	Yes O	No
You	r Ad	visory Services		_
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
		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> ?	C	Œ
15.	(a) 0%	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:	Yes	NI.
	Wha	nt is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : %		
13.	Аррі 3	roximate number of the <i>private fund's</i> beneficial owners:		
		E: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount and organizational documents of the fund).	set fo	rth
12.		mum investment commitment required of an investor in the <i>private fund</i> : 50,000		
<u>Ow</u>	<u>ners</u>	<u>hip</u>		
11.		rent gross asset value of the <i>private fund</i> : 56,011		
		E: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
		ate fund: INVESTING IN & TRADING IN INTERNATIONAL INVESTMENTS	0	
10.		at type of fund is the $private$ fund? Hedge fund $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital fund $^{f C}$	© ∩H	her
		estment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?		
€.		ng your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the	Yes O	œ.
	,		0	
		stment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	_	_
	NOT	E: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled		12
3.	(a)	Is this <i>private fund</i> a "fund of funds"?	Yes	(i
	subs	E: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or stantially all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund poses of this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substant is assets in a single master fund.	antiall	ly

	No Information Filed		
		Va	s N
9	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	_	
•	NOTE: For purposes of this question, do not consider feeder funds of the private fund.	•	1
	NOTE. For purposes of this question, do not consider feeder funds of the private fund.		
۱.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
ri۱	vate Offering		
		Ye	s N
L.	Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation D of the Securities Act o 1933?	f ⊚) (
2.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-420794		
S	ERVICE PROVIDERS		
uc	<u>ditors</u>		
		Υe	s l
3.	(a) (1) Are the private fund's financial statements subject to an annual audit?	0	,
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	6	,
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more the	nan o	ne
	auditing firm, 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 firms		
	(b) Name of the auditing firm:		
	COHEN & COMPANY, LTD		
	COHEN & COMPANY, LTD		
	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):		
	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:	Yes	No
	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:	Yes ⊙	No C
	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	_	_
	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:	•	0
	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:	•	0
	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:	•	0
	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:	⊙	0
	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:	⊙⊙	0

•	Yes C No C Report Not	Yet Received		
	you check "Report Not Yet e report is available.	Received," you must promptly file	e an amendment to your Form ADV to update your respons	e when
Prime Bro	<u>ker</u>			Yes No
24. (a) Do	oes the <i>private fund</i> use on	e or more prime brokers?		O O
If	•	· · · · · · · · · · · · · · · · · · ·	(b) through (e) below for each prime broker the <i>private fu</i> t complete questions (b) through (e) separately for each pr	und uses.
		No Inf	ormation Filed	
<u>Custodian</u>	1			
				Yes No
If	the answer to question 25	(a) is "yes," respond to questions	brokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> plete questions (b) through (g) separately for each custodian	
A	dditional Custodian Info	rmation : 1 Record(s) Filed.		
	· ·	ore than one custodian, you must	ns (b) through g) below for each custodian the <i>private fun</i> complete questions (b) through (g) separately for each cu	
	(c) Primary business nam BROWN BROTHERS HA			
	` `	•	stody of the private fund's assets (city, state and country):	
	City: BOSTON	State: Massachusetts	Country: United States	
				Yes No
	(e) Is the custodian a <i>rela</i>	ted person of your firm?		0 0
	(f) If the custodian is a bi	oker-dealer, provide its SEC regis	tration number (if any):	
	CRD Number (if any):			
	(g) If the custodian is not legal entity identifier (aler but does not have an SEC registration number, provide	e its
Administr	ator			
				Yes No
If	the answer to question 26.	· · · · · · · · · · · · · · · · · · ·	(b) through (f) below. If the <i>private fund</i> uses more than	⊙ C one
ac	uninistrator, you must com	plete questions (b) through (f) se	paratery for each administrator.	
A	dditional Administrator	Information : 1 Record(s) File	d.	

		•	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	uestions (b) through (f) below. If the <i>private fun-</i> h (f) separately for each administrator.	a uses more than one
	(o) Name of administi	rator:		
			DINT PRIVATE FUND SOLUTIONS		
	(c	c) Location of admin	istrator (city, state and country):		
		City:	State:	Country:	
		DENVER	Colorado	United States	
					Yes No
	(0	d) Is the administrat	or a <i>related person</i> of your firm?		0 0
	(6	e) Does the administ	crator prepare and send investor	account statements to the <i>private fund's</i> investo	ors?
			o all investors) ${}^{f C}$ Some (provide	d to some but not all investors) $ {}^{f C}$ No (provided	to no
	(f		estors? If investor account staten	who sends the investor account statements to t nents are not sent to the (rest of the) <i>private fur</i>	
27.	that is n 100% Include obtaining	ot your <i>related perso</i> only those assets wh g any relevant quotes	on? ere (i) such <i>person</i> carried out th	nd's assets (by value) was valued by a <i>person</i> , so the valuation procedure established for that asset purposes of investor subscriptions, redemptions and by such <i>person</i> .	, if any, including
0.0	drohovo				
Mai	<u>keters</u>				Yes No
		es the <i>private fund</i> us	se the services of someone other	than you or your <i>employees</i> for marketing purp	05053
	(a) Doe You solid mar	must answer "yes" v citor, or similar <i>perso</i>	whether the <i>person</i> acts as a place <i>n</i> . If the answer to question 28.(<i>d</i> uses. If the <i>private fund</i> uses r	than you or your <i>employees</i> for marketing purposement agent, consultant, finder, introducer, mura) is "yes," respond to questions (b) through (g) more than one marketer you must complete que	oses? C © nicipal advisor or other below for each such
	(a) Doe You solid mar	must answer "yes" v citor, or similar <i>perso</i> keter the <i>private fun</i>	whether the <i>person</i> acts as a place <i>n</i> . If the answer to question 28.(and uses. If the <i>private fund</i> uses reseter.	ement agent, consultant, finder, introducer, mur a) is "yes," respond to questions (b) through (g)	oses? C © nicipal advisor or other below for each such
28.	(a) Doe You solid man sepa	must answer "yes" v citor, or similar <i>perso</i> keter the <i>private fun</i> arately for each mark	whether the <i>person</i> acts as a place <i>n</i> . If the answer to question 28.(and uses. If the <i>private fund</i> uses reseter.	nement agent, consultant, finder, introducer, mur a) is "yes," respond to questions (b) through (g) more than one marketer you must complete que	oses? C © nicipal advisor or other below for each such
28.	(a) Doe You solid mar	must answer "yes" v citor, or similar <i>perso</i> keter the <i>private fun</i> arately for each mark	whether the <i>person</i> acts as a place <i>n</i> . If the answer to question 28.(and uses. If the <i>private fund</i> uses reseter.	nement agent, consultant, finder, introducer, mur a) is "yes," respond to questions (b) through (g) more than one marketer you must complete que	oses? C © nicipal advisor or other below for each such
28. A. PF	(a) Doe You solid mar sepa	must answer "yes" v citor, or similar <i>perso</i> keter the <i>private fun</i> arately for each mark	whether the <i>person</i> acts as a place <i>n</i> . If the answer to question 28.(<i>d</i> uses. If the <i>private fund</i> uses receter.	nement agent, consultant, finder, introducer, mur a) is "yes," respond to questions (b) through (g) more than one marketer you must complete que	oses? C © nicipal advisor or other below for each such
28. A. PF	(a) Doe You solid mar sepa	must answer "yes" vecitor, or similar persocketer the private fundarately for each mark	whether the <i>person</i> acts as a place in. If the answer to question 28.(ind uses. If the <i>private fund</i> uses receter. Note that the private is a place of the private is a pla	tement agent, consultant, finder, introducer, mura) is "yes," respond to questions (b) through (g) more than one marketer you must complete que	oses? C © nicipal advisor or other below for each such
A. PP	(a) Doe You solid man sepa	must answer "yes" vecitor, or similar persocketer the private fundarately for each mark JND About the Private The of the private fundarately fundarately for each mark About the Private fundarately fundarate	whether the <i>person</i> acts as a place in. If the answer to question 28.0 divided uses. If the <i>private fund</i> uses receter. Note that the private is a second of the private fund uses receter. Note that the private fund uses received the private fund in the private f	tement agent, consultant, finder, introducer, mura) is "yes," respond to questions (b) through (g) more than one marketer you must complete que	oses? C © nicipal advisor or other below for each such
28. A. PF	(a) Doe You solid man sepa	must answer "yes" vecitor, or similar perso related to the private fundarately for each mark and the private fundarately for the private fundarately fundarate fundara	whether the <i>person</i> acts as a place in. If the answer to question 28.0 divided uses. If the <i>private fund</i> uses receter. Note that the private fund uses receter.	tement agent, consultant, finder, introducer, mura) is "yes," respond to questions (b) through (g) more than one marketer you must complete que	oses? C © nicipal advisor or other below for each such
28. A. PF	(a) Doe You solid mar sepa	must answer "yes" vecitor, or similar perso relation, or similar perso relation, or similar perso relation to the private function of the private function of the private function of the function of the private function of the function of the private function of the priv	whether the <i>person</i> acts as a place in. If the answer to question 28.0 divided uses. If the <i>private fund</i> uses receter. Note that the private fund uses receter.	tement agent, consultant, finder, introducer, mura) is "yes," respond to questions (b) through (g) more than one marketer you must complete que	oses? C © nicipal advisor or other below for each such
A. PF	(a) Doe You solid mar sepa	must answer "yes" vecitor, or similar perso related to the private fundarately for each mark and the private fundarately for the private fundarately fundarate fundara	whether the <i>person</i> acts as a place in. If the answer to question 28.0 divided uses. If the <i>private fund</i> uses receter. Note that the private fund uses receter.	tement agent, consultant, finder, introducer, mura) is "yes," respond to questions (b) through (g) more than one marketer you must complete que	oses? C © nicipal advisor or other below for each such
A. PF	(a) Doe You solid mar sepa	must answer "yes" vocitor, or similar perso release the private fundarately for each mark marked by the private fundate fundate fundate fundate fundate fundate fundate the "805-" prefix-9163225470	whether the <i>person</i> acts as a place in. If the answer to question 28.0 divided uses. If the <i>private fund</i> uses receter. Note that the private fund uses receter.	rement agent, consultant, finder, introducer, mural is "yes," respond to questions (b) through (g) more than one marketer you must complete que to Information Filed	oses? C © nicipal advisor or other below for each such
28. A. PF Info 1.	(a) Doe You solid mar sepa RIVATE FU rmation (a) Nam SEG (b) Priv (inc 805	must answer "yes" vecitor, or similar perso relation, or similar perso relation, or similar perso relation to the private function of the private function of the private function of the "805-" prefix ate fund identification lude the "805-" prefix -9163225470	whether the person acts as a place on. If the answer to question 28.0 of uses. If the private fund uses receter. Note that the private fund uses receter. Note that the private fund on	ganized:	oses? C © nicipal advisor or other below for each such
28. A. PF Info 1.	(a) Doe You solid mar sepa RIVATE FU rmation (a) Nam SEG (b) Priv (inc 805	must answer "yes" vecitor, or similar perso relation, or similar perso relation, or similar perso relation to the private function of the private function of the private function of the "805-" prefix at a function of the "805-" prefix -9163225470	whether the person acts as a place on. If the answer to question 28.0 of uses. If the private fund uses receter. Note that the private fund uses receter. Note that the private fund on	ganized:	oses? C © nicipal advisor or other below for each such
28. A. Pr Info 1.	(a) Doe You solid mar sepa	must answer "yes" vecitor, or similar perso related the private fundarately for each mark marked by the private fundarate fund identification lude the "805-" prefix -9163225470 the laws of what state the: aware me(s) of General Particulars or similar personal particular personal per	whether the person acts as a place of the answer to question 28.0 of duses. If the private fund uses receter. Note that the private fund uses receter. Note that the private fund of the	ganized: cry: d States rs (or persons serving in a similar capacity):	oses? C © nicipal advisor or other below for each such

Name of LWF, INC.	General Partner, Manager, Trustee, or Director	
(b) If filing	ng an umbrella registration, identify the filing adviser and/or relying adviser(s,) that sponsor(s) or manage(s) this <i>private fun</i>
	No Information Filed	
☑ (1) qua	re fund (check all that apply; you must check at least one): Inalifies for the exclusion from the definition of investment company under sect	tion $3(c)(1)$ of the Investment Company Act of
1940 (2) qua 1940	lalifies for the exclusion from the definition of investment company under sec	tion 3(c)(7) of the Investment Company Act of
List the na	ame and country, in English, of each foreign financial regulatory authority with	n which the <i>private fund</i> is registered.
	No Information Filed	
(a) Is this	s a "master fund" in a master-feeder arrangement?	Yes M
	, what is the name and <i>private fund</i> identification number (if any) of the feed	
	private fund	Private fund identification number
	BRYANT & HAMILL PRIVATE OPPORTUNITIES OFFSHORE FUND 2020, LP	805-3134481791
		Yes I
(c) Is this		
	a "feeder fund" in a master-feeder arrangement?	
Private	is a "feeder fund" in a master-feeder arrangement? In, what is the name and <i>private fund</i> identification number (if any) of the mase of <i>private fund</i> : It is a fund identification number:	
Private (includ	, what is the name and <i>private fund</i> identification number (if any) of the mas e of <i>private fund</i> : The fund identification number:	ter fund in which this <i>private fund</i> invests? If whether you are filing a single Schedule D,
Private (included) NOTE: You Section 7.E	what is the name and <i>private fund</i> identification number (if any) of the mase of <i>private fund</i> : The fund identification number: The de the "805-" prefix also) The must complete question 6 for each master-feeder arrangement regardless of	ter fund in which this <i>private fund</i> invests? of whether you are filing a single Schedule D,
Private (included) NOTE: You Section 7.E If you are 1 (1), for each	what is the name and <i>private fund</i> identification number (if any) of the mass of <i>private fund</i> : The fund identification number: The de the "805-" prefix also) The must complete question 6 for each master-feeder arrangement regardless of B.(1) for the master-feeder arrangement or reporting on the funds separately filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement arrangement or reporting on the funds separately filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement arrangement or reporting on the funds separately filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement arrangeme	ter fund in which this <i>private fund</i> invests? of whether you are filing a single Schedule D,
Private (included) NOTE: You Section 7.E If you are (1), for each (1),	what is the name and private fund identification number (if any) of the mase of private fund: the fund identification number: de the "805-" prefix also) u must complete question 6 for each master-feeder arrangement regardless of B.(1) for the master-feeder arrangement or reporting on the funds separately filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement and of the feeder funds answer the following questions:	ter fund in which this <i>private fund</i> invests? If whether you are filing a single Schedule D, According to the instructions to this Section 7.B
Private (included) NOTE: You Section 7.E If you are (1), for each (1),	what is the name and private fund identification number (if any) of the mass of private fund: The fund identification number: The fund identification number reporting on the funds separately of the funds separately full for a master-feeder arrangement of the feeder funds answer the following questions: The fund identification number (if any) of the mass of the fund identification number (if any) of the mass of the mass of the mass of the fund identification number (if any) of the mass of the mass of the mass of the fund identification number (if any) of the mass of the mas	ter fund in which this <i>private fund</i> invests? If whether you are filing a single Schedule D, According to the instructions to this Section 7.B
Private (included) NOTE: You Section 7.E If you are 1 (1), for each Additional 7. If you Section Sec	what is the name and private fund identification number (if any) of the mass of private fund: The fund identification number: The fund identification number reporting on the funds separately of the master-feeder arrangement or reporting on the funds separately filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement of the feeder fund in formation: The fund identification number (if any) of the masser reporting identification number (identification number	ter fund in which this <i>private fund</i> invests? If whether you are filing a single Schedule D, According to the instructions to this Section 7.E
Private (included) NOTE: You Section 7.E If you are 1 (1), for each Additional 7. If you Section Sec	what is the name and private fund identification number (if any) of the mass of private fund: The fund identification number: The fund identification number reporting on the funds separately of the funds separately full for a master-feeder arrangement of the feeder funds answer the following questions: The fund identification number (if any) of the mass of the fund identification number (if any) of the mass of the mass of the mass of the fund identification number (if any) of the mass of the mass of the mass of the fund identification number (if any) of the mass of the mas	ter fund in which this <i>private fund</i> invests? If whether you are filing a single Schedule D, According to the instructions to this Section 7.E
Private (included) NOTE: You Section 7.E If you are 1 (1), for each 1 (1), for each 1 (2), for each 1 (3), for each 1 (4), for each 1 (5), for each 1 (6), f	what is the name and private fund identification number (if any) of the mass of private fund: The fund identification number:	ter fund in which this <i>private fund</i> invests? If whether you are filing a single Schedule D, According to the instructions to this Section 7.E
Private (included) NOTE: You Section 7.E If you are 1 (1), for each 1 (1), for each 1 (2), for each 1 (3), for each 1 (4), for each 1 (5), for each 1 (6), f	what is the name and private fund identification number (if any) of the mass of private fund: The fund identification number: The	ter fund in which this <i>private fund</i> invests? If whether you are filing a single Schedule D, According to the instructions to this Section 7.B
Private (included) NOTE: You Section 7.E If you are 1 (1), for each 1 (2) Additional 7. If you Section (a) (b)	what is the name and private fund identification number (if any) of the mass of private fund: The fund identification number:	ter fund in which this <i>private fund</i> invests? If whether you are filing a single Schedule D, According to the instructions to this Section 7.B
Private (included) NOTE: You Section 7.E If you are 1 (1), for each 1 (2) Additional 7. If you Section (a) (b)	what is the name and private fund identification number (if any) of the mass of private fund: The fund identification number: The fund identification number: The fund identification number: The fund identification number: The master-feeder arrangement or reporting on the funds separately filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement and the funds answer the following questions: The filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement and the filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement on 7.B.(1), for each of the feeder funds answer the following questions: Name of the private fund: SEGALL BRYANT & HAMILL PRIVATE OPPORTUNITIES OFFSHORE FUND 200 Private fund identification number: (include the "805-" prefix also) 805-3134481791 Under the laws of what state or country is the private fund organized: State: Country: Cayman Islands 1) Name(s) of General Partner, Manager, Trustee or Directors (or persons see	ter fund in which this <i>private fund</i> invests? of whether you are filing a single Schedule D, deccording to the instructions to this Section 7.Becording to the instructions to this
Private (included) NOTE: You Section 7.E If you are 1 (1), for each 1 (2) Additional 7. If you Section (a) (b)	what is the name and private fund identification number (if any) of the mass of private fund: The fund identification number: The	ter fund in which this <i>private fund</i> invests? of whether you are filing a single Schedule D, deccording to the instructions to this Section 7.E

	(d) (2)	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) private fund:	this	
		No Information Filed		
	(e)	The <i>private fund</i> (check all that apply; you must check at least one):		
	(6)	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940	nent	
		\Box (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940	nent	
	(f)	List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.		
		Name of Country/English Name of Foreign Financial Regulatory Authority		
		Cayman Islands - Cayman Islands Monetary Authority		
	substantially purposes of t	urposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fun this question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substa		
			Yes	No
8.		rivate fund a "fund of funds"?	\odot	\circ
		urposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled rehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
	(b) If yes, d	oes the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	•	0
9.		last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	Yes O	No ⊙
10				
10.	• •	fund is the private fund?	_	
	-	and $^{f C}$ liquidity fund $^{f C}$ private equity fund $^{f C}$ real estate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital fund $^{f C}$ PURSUING STRATEGIES ACROSS PRIVATE EQUITY, PRIVATE DEBT, REAL ESTATE AND REAL ASSETS	∮ Oth	ier
	NOTE: For de	efinitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gros \$ 37,222,684	s asset value of the <i>private fund</i> :		
<u>Ow</u>	nership			
12.	\$ 1,000,000 NOTE: Repor	estment commitment required of an investor in the <i>private fund</i> : t the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount szational documents of the fund).	et for	-th
13.	Approximate	number of the <i>private fund's</i> beneficial owners:		
14.	What is the a	approximate percentage of the <i>private fund</i> beneficially owned by you and your related persons:		
15.	(a) What is	the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		

					Yes	No
	(b)	If the private fund qualifies for the exclusion Investment Company Act of 1940, are sale		vestment company under section 3(c)(1) of the alified clients?	0	•
16.	Wha	t is the approximate percentage of the <i>priv</i>	vate fund beneficially owne	d by non- <i>United States persons</i> :		
You	ır Ad	visory Services				
17	(-)	And you are a substitution to this prince to find?			Yes	No
17.	. ,	Are you a subadviser to this <i>private fund</i> ? If the answer to question 17 (a) is "yes " r		file number, if any, of the adviser of the private fund.	C If the	⊚
	(0)	answer to question 17.(a) is yes, p		the number, if any, of the adviser of the private rund.	II tile	
			No Information	n Filed		
					Yes	No
18.	(a)	Do any investment advisers (other than th fund?	ne investment advisers liste	d in Section 7.B.(1).A.3.(b)) advise the <i>private</i>	0	•
	(b)	If the answer to question 18.(a) is "yes," p the answer to question 18.(a) is "no," leav		file number, if any, of the other advisers to the <i>private</i>	e func	d. If
			No Information	on Filed		
					Yes	No
19.	Are	your <i>clients</i> solicited to invest in the <i>private</i>	re fund?		\odot	\circ
	NOT	E: For purposes of this question, do not co	nsider feeder funds of the _l	private fund.		
20.	App 1%	roximately what percentage of your <i>clients</i>	has invested in the <i>private</i>	fund?		
Priv	rate	<u>Offering</u>				
					Yes	No
21.	Has 193		ion from registration of its s	securities under Regulation D of the Securities Act of	0	О
22.	If ye	es, provide the <i>private fund's</i> Form D file nu	umber (if any):			
	For	m D file number				
	021	-377457				
		CE PROVIDERS				
Aud	litor	<u>5</u>			Yes	No
23.	(a)	(1) Are the <i>private fund's</i> financial stateme	ents subject to an annual a	udit?	<u>@</u>	0
		(2) If the answer to question 23.(a)(1) is "	"yes," are the financial stat	ements prepared in accordance with U.S. GAAP?	•	Õ
		If the answer to question 23.(a)(1) is "yes auditing firm, you must complete question		through (h) below. If the <i>private fund</i> uses more tha y for each auditing firm.	ın one	:
		Additional Auditor Information: 1 Rec	cord(s) Filed.			
		If the answer to question 23.(a)(1) is "yo than one auditing firm, you must comple		b) through (h) below. If the <i>private fund</i> uses more f) separately for each auditing firm.		
		(b) Name of the auditing firm: PLANTE & MORAN, PLLC				
		(c) The location of the auditing firm's of	ffice responsible for the <i>pri</i>	vate fund's audit (city, state and country):		
		City:	State:	Country:		
		CHICAGO	Illinois	United States		

	(d) Is the auditing firm an independent public accountant?	•	О
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number:		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0
		Υє	es No
	Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	€	0
	Do all of the reports prepared by the auditing firm for the <i>private fund</i> since your last <i>annual updating amendment</i> contai unqualified opinions?	n	
	€ Yes C No C Report Not Yet Received		
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response the report is available.	∍ wh	en
rime B	<u>roker</u>	Υє	es No
1. (a)	Does the <i>private fund</i> use one or more prime brokers?	c	
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private ful</i> . If the <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each pribroker.		ses.
	No Information Filed		
` '	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets?	•	
5. (a)		⊙ uses	0
5. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> (g)	⊙ uses	0
5. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian	uses an.	C. If
5. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> .	uses an.	C. If
5. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian (b) Legal name of custodian:	uses an.	C. If
5. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian: CIBC BANK US (c) Primary business name of custodian: CIBC (d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state and country):	uses an.	C. If
5. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian: CIBC BANK US (c) Primary business name of custodian: CIBC (d) The location of the custodian's office responsible for <i>custody</i> of the <i>private fund</i> 's assets (city, state and country): City: State: Country:	uses an.	C. If
5. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> . If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. CIBC BANK US (c) Primary business name of custodian: CIBC (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: CHICAGO Illinois United States	uses an.	. If
5. (a)	Does the <i>private fund</i> use any custodians (including the prime brokers listed above) to hold some or all of its assets? If the answer to question 25.(a) is "yes," respond to questions (b) through (g) below for each custodian the <i>private fund</i> the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. Additional Custodian Information: 1 Record(s) Filed. If the answer to question 25.(a) is "yes," respond to questions (b) through g) below for each custodian the <i>private fund</i> . If the <i>private fund</i> uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. CIBC BANK US (c) Primary business name of custodian: CIBC (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: CHICAGO Illinois United States	uses.	. If

		- CRD Number (if any):						
	(g)	If the custodian is not a legal entity identifier (if		is a broker-dea	ller but does not have an SEC	C registration number, prov	vide its	
<u>Admini</u>	strato	<u>r</u>					Yes	No
26. (a)	If the		ı) is "yes," respon	d to questions	n? (b) through (f) below. If the a arately for each administrato		⊙ an one	O
	Add	itional Administrator Ir	formation: 1 R	ecord(s) Filed				
		•		•	is (b) through (f) below. If th eparately for each administra	•	than one	
	(b)	Name of administrator: ULTIMUS FUND SOLUTION	DNS					
	(c)	Location of administrato City: CINCINNATI	r (city, state and	country): State: Ohio	Country: United States		Yes No	
	(d)	Is the administrator a re	elated person of ye	our firm?			C ©	
	(e)	·	·		nt statements to the $private\ f$ ome but not all investors) $ $			
	(f)	·	If investor accou		sends the investor account sta are not sent to the (rest of th	•	-	
tha 100 Inc obt	is no % ude or aining	t your related person? nly those assets where (i)	such <i>person</i> carr (ii) the valuation	ied out the valuused for purpo	essets (by value) was valued by the sets of investor subscriptions, such person.	for that asset, if any, inclu	ding	
<u>Market</u>	ers						Yes	No
28. (a)	You n solicit mark	nust answer "yes" whethe cor, or similar <i>person</i> . If th	r the <i>person</i> acts ne answer to ques	as a placement tion 28.(a) is "	rou or your <i>employees</i> for ma : agent, consultant, finder, inl yes," respond to questions (b han one marketer you must o	troducer, municipal advisor through (g) below for ea	C r or other ich such	•
				No Info	rmation Filed			

A. PRIVATE FUND

Tn	formation	About the	Drivato	Fund
T11	ioiiiauoii	ADOUL LIIE	riivale	ruiiu

1. (a)	Name	of the	private	fund:

SEGALL BRYANT & HAMILL PRIVATE OPPORTUNITIES FUND, LP

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

805-3854953510

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

State: Country: Delaware United States

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

Name of General Partner, Manager, Trustee, or Director LWF, INC.

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

No Information Filed

- 4. The *private fund* (check all that apply; you must check at least one):
 - (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940
 - (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940
- 5. List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.

No Information Filed

Yes No

 \circ

⊚

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

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

(1)	3 ,
Name of private fund	Private fund identification number
SEGALL BRYANT & HAMILL PRIVATE OPPORTUNITIES OFFSHORE FUND. LP	805-1203784710

Yes No

- (c) Is this a "feeder fund" in a master-feeder arrangement?
- (d) If yes, what is the name and *private fund* identification number (if any) of the master fund in which this *private fund* invests? Name of *private fund*:

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

NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.B.(1) for the master-feeder arrangement or reporting on the funds separately.

7. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B. (1), for each of the feeder funds answer the following questions:

Additional Feeder Fund Information: 1 Record(s) Filed.

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 each of the feeder funds answer the following questions:

	(a)	Name of the <i>private fund</i> :		
		SEGALL BRYANT & HAMILL PRIVATE OPPORTUNITIES OFFSHORE FUND, LP		
	(b)	Private fund identification number:		
		(include the "805-" prefix also)		
		805-1203784710		
	(c)	Under the laws of what state or country is the <i>private fund</i> organized:		
		State: Country: Cayman Islands		
	(d) (1)	Name(s) of General Partner, Manager, Trustee or Directors (or <i>persons</i> serving in a similar capacity):		
	(-7 (-7	Name of General Partner, Manager, Trustee or Director		7
		LWF, INC.		
	(d) (2)	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) private fund:) this	
		No Information Filed		
	(e)	The <i>private fund</i> (check all that apply; you must check at least one):		
		\Box (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940	nent	
		(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940	nent	
	(f)	List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.	i	
		Name of Country/English Name of Foreign Financial Regulatory Authority		٦
		Other - CAYMAN ISLANDS MONETARY AUTHORITY (CIMA)		1
	substantially purposes of t	rposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fur his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substats in a single master fund.		
	substantially purposes of t	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fur his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substa		У
8.	substantially purposes of t all of its asse	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fur his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substa	antiall	У
8.	substantially purposes of t all of its asse (a) Is this proposes.	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fur his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substa ts in a single master fund.	entiall Yes ⊙	y No
8.	substantially purposes of tall of its asset (a) Is this property of the substantial of th	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master furhis question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substate in a single master fund. Sivate fund a "fund of funds"? The rooses of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled.	entiall Yes ⊙	y No
8.	substantially purposes of tall of its asset (a) Is this property of the substantial of th	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substates in a single master fund. Sivate fund a "fund of funds"? The reposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled ephicles, regardless of whether they are also private funds or registered investment companies.	Yes • • • • • • • • • • • • • • • • • •	No C
8.	substantially purposes of tall of its asset (a) Is this property (b) If yes, do	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substates in a single master fund. Sivate fund a "fund of funds"? The reposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled ephicles, regardless of whether they are also private funds or registered investment companies.	Yes ()	No C
	substantially purposes of tall of its asset (a) Is this property (b) If yes, do During your l	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substats in a single master fund. Sivate fund a "fund of funds"? Proposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled ehicles, regardless of whether they are also private funds or registered investment companies. Does the private fund invest in funds managed by you or by a related person?	Yes O Yes	No C No
9.	substantially purposes of tall of its asset (a) Is this property of the second of the	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substats in a single master fund. Sivate fund a "fund of funds"? Proposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled ehicles, regardless of whether they are also private funds or registered investment companies. Poses the private fund invest in funds managed by you or by a related person? The proposed of the private fund invest in securities issued by investment companies registered under the	Yes O Yes	No C No
9.	substantially purposes of tall of its asset (a) Is this property investment very (b) If yes, do During your I Investment C What type of hedge fur	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substates in a single master fund. Sivate fund a "fund of funds"? Proposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled ehicles, regardless of whether they are also private funds or registered investment companies. Does the private fund invest in funds managed by you or by a related person? The proposed of the private fund invest in securities issued by investment companies registered under the company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	Yes O Yes O	y No ○ No •
9.	substantially purposes of tall of its asset (a) Is this property investment very (b) If yes, do During your I Investment Co. What type of Co. hedge furprivate fund:	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substates in a single master fund. A "fund of funds"? The prosess of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled encicles, regardless of whether they are also private funds or registered investment companies. The private fund invest in funds managed by you or by a related person? The private fund invest in funds managed by you or by a related person? The private fund (other than "money market funds," to the extent provided in Instruction 6.e.)? The private fund? The private fund? The private fund? The private fund? The private fund of the private equity fund of the estate fund of the private fund? The private fund? The private fund of the private equity fund of the estate fund of the estate fund of the private equity fund of the estate fund of the estate fund of the private fund?	Yes O Yes O	y No ○ No •
9.	substantially purposes of tall of its asset (a) Is this property of the state of th	all of their assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund his question if it issued multiple classes (or series) of shares or interests, and each class (or series) invests substate in a single master fund. Invate fund a "fund of funds"? The proses of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled each class of whether they are also private funds or registered investment companies. The private fund invest in funds managed by you or by a related person? The private fund invest in funds managed by you or by a related person? The private fund invest in securities issued by investment companies registered under the ompany Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e)? The private fund? The private fund? The private fund? The private fund of the private equity fund of the light of the securitized asset fund of the venture capital fund of the private fund types, please see Instruction 6 of the Instructions to Part 1A. The private fund:	Yes O Yes O	y No ○ No •

<u>Ow</u>	<u>nership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 1,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount sin the organizational documents of the fund).	set for	th
13.	Approximate number of the <i>private fund's</i> beneficial owners: 66		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 9%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%		
		Yes	No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to qualified clients?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
W			
YOU	<u>ır Advisory Services</u>	Yes	No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	•
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . answer to question 17.(a) is "no," leave this question blank.		
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund</i> ?	0	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private</i> the answer to question 18.(a) is "no," leave this question blank.	e fund	. If
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	⊙	\circ
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 2%		
<u>Pri</u>	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 yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-328168		
B. S	ERVICE PROVIDERS		
	litors		

Yes No

	auditing firm, 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>priva</i> than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm			
	(b) Name of the auditing firm: PLANTE & MORAN, PLLC			
	(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: CHICAGO Illinois United States			
			Yes	N
	(d) Is the auditing firm an independent public accountant?		⊙	1
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?		⊙	(
	If yes, Public Company Accounting Oversight Board-Assigned Number:			
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company A Oversight Board in accordance with its rules?	ccounting	•	1
(g)) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distribu <i>fund's</i> investors?	ted to the <i>private</i>	Ye	
,	, , , , , , , , , , , , , , , , , , , ,	·	G	
,	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating	·	G	
,	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating unqualified opinions?	amendment contai	G in	
(h)	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating unqualified opinions? Yes O No O Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to up	amendment contai	G in	
(h)	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating unqualified opinions? Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to up the report is available. Broker	amendment contai	in e wh	er
(h)	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating unqualified opinions? Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to up the report is available.	amendment contain polate your respons	Ye C	e es
(h)	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating unqualified opinions? Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to up the report is available. Broker Does the private fund use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime b If the private fund uses more than one prime broker, you must complete questions (b) through (e) separate fund uses more than one prime broker, you must complete questions (b) through (e) separate fund uses more than one prime broker, you must complete questions (b) through (e) separate fund uses more than one prime broker, you must complete questions (b) through (e) separate fund uses more than one prime broker, you must complete questions (b) through (e) separate fund uses more than one prime broker, you must complete questions (b) through (e) separate fund uses more than one prime broker, you must complete questions (b) through (e) separate fund uses more than one prime broker, you must complete questions (b) through (e) separate fund uses more fund uses more than one prime broker, you must complete questions (b) through (e) separate fund uses more fund uses fun	amendment contain polate your respons	Ye C	er
(h)	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating unqualified opinions? Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to up the report is available. Broker Broker Does the private fund use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime b If the private fund uses more than one prime broker, you must complete questions (b) through (e) sep broker.	amendment contain polate your respons	Ye C	er es
(h)	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating unqualified opinions? Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to up the report is available. Broker Does the private fund use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime b If the private fund uses more than one prime broker, you must complete questions (b) through (e) sep broker. No Information Filed	amendment contain polate your respons	Ye C	er Ssees
(h)	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating unqualified opinions? Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to up the report is available. Broker Does the private fund use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime b If the private fund uses more than one prime broker, you must complete questions (b) through (e) sep broker. No Information Filed	amendment contain podate your respons roker the private fundated private fundated privated pr	Ye Cond und unime	er Ssess
(h)	fund's investors? Do all of the reports prepared by the auditing firm for the private fund since your last annual updating unqualified opinions? Yes No Report Not Yet Received If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to up the report is available. Broker Does the private fund use one or more prime brokers? If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime b If the private fund uses more than one prime broker, you must complete questions (b) through (e) sep broker. No Information Filed	amendment contain amendment contain polarie your respons to the private fund arrately for each private fund and the private fund arrately for the private fund arrately for the private fund arrately fund arrately fund arrately for the private fund arrately fund arratel	Ye County Yee	e ess

(b)	Legal name of custodian: CIBC BANK US			
(c)	Primary business name of co	ustodian:		
(d)	The location of the custodia	n's office responsible for <i>cust</i>	rody of the <i>private fund's</i> assets (city, state a	and country):
	City:	State:	Country:	
	CHICAGO	Illinois	United States	
				Yes
(e)	Is the custodian a related po	erson of your firm?		О
(f)	If the custodian is a broker-	dealer, provide its SEC regist	ration number (if any):	
	CRD Number (if any):			
	If the custodian is not a bro	ker-dealer, or is a broker-dea	aler but does not have an SEC registration nu	umber, provide its
(g)	legal entity identifier (if any)		Vo
rato	legal entity identifier (if any	<u>, </u>	1 ?	
rato Does f the	r the private fund use an admi	inistrator other than your firn "yes," respond to questions	n? (b) through (f) below. If the <i>private fund</i> us parately for each administrator.	•
rato Does f the	r the private fund use an admi	inistrator other than your firn "yes," respond to questions questions (b) through (f) sep	(b) through (f) below. If the <i>private fund</i> us arately for each administrator.	•
rato Ooes f the dmir	the private fund use an administrator, you must complete tional Administrator Informe answer to question 26.(a)	inistrator other than your firm "yes," respond to questions questions (b) through (f) sep mation: 1 Record(s) Filed is "yes," respond to question	(b) through (f) below. If the <i>private fund</i> us arately for each administrator.	es more than one
rato Does f the ddmir Addi If tl adn	the private fund use an administrator, you must complete tional Administrator Informe answer to question 26.(a)	inistrator other than your firm "yes," respond to questions questions (b) through (f) sep mation: 1 Record(s) Filed is "yes," respond to question	(b) through (f) below. If the <i>private fund</i> us varately for each administrator. I. Is (b) through (f) below. If the <i>private fund</i> is	es more than one
rato Does f the ddmir Addi If tl adn	the private fund use an administrator, you must complete the answer to question 26.(a) is distributed and the answer to question 26.(b) is distributed answer to question 26.(b) is distributed answer to question 26.(c) in the answer to question 26.(d) is distributed and the answer to question 26.(d) is distributed answer to question 26.(d) is distributed and the answer to question 26.(d) is	inistrator other than your firm "yes," respond to questions questions (b) through (f) sep rmation: 1 Record(s) Filed is "yes," respond to question te questions (b) through (f) s	(b) through (f) below. If the <i>private fund</i> us varately for each administrator. I. Is (b) through (f) below. If the <i>private fund</i> is	
Pooes of the design of the des	the private fund use an administrator Informal Administrator Information Info	inistrator other than your firm "yes," respond to questions questions (b) through (f) sep mation: 1 Record(s) Filed is "yes," respond to question re questions (b) through (f) s	(b) through (f) below. If the <i>private fund</i> us varately for each administrator. I. Is (b) through (f) below. If the <i>private fund</i> is	es more than one
Pooes of the design of the des	the private fund use an administrator answer to question 26.(a) is nistrator, you must complete the answer to question 26.(a) is nistrator, you must complete the answer to question 26.(a) ninistrator, you must complete Name of administrator: ULTIMUS FUND SOLUTIONS Location of administrator (city:	inistrator other than your firm "yes," respond to questions questions (b) through (f) sep mation: 1 Record(s) Filed is "yes," respond to question te questions (b) through (f) s ity, state and country): State:	(b) through (f) below. If the <i>private fund</i> us parately for each administrator. I. Is (b) through (f) below. If the <i>private fund</i> is eparately for each administrator. Country:	es more than one
Pooes of the design of the des	the private fund use an administrator Information answer to question 26.(a) is distributed in the answer to question 26.(b) is distributed in the answer to question 26.(a) in the answer to question 26.(b) distributed in the answer to question 26.(b) distributed in the answer to question 26.(c) in the answer to question 26.(b) distributed in the answer to question 26.(c) in the answer to question 26.(c) in the answer to question 26.(d) is distributed in the answer to question 26.(d) in	inistrator other than your firm "yes," respond to questions questions (b) through (f) sep mation: 1 Record(s) Filed is "yes," respond to question te questions (b) through (f) s ity, state and country):	(b) through (f) below. If the <i>private fund</i> us parately for each administrator. I. Is (b) through (f) below. If the <i>private fund</i> is eparately for each administrator.	es more than one
Pooes of the idmir	the private fund use an administrator answer to question 26.(a) is nistrator, you must complete the answer to question 26.(a) is nistrator, you must complete the answer to question 26.(a) ninistrator, you must complete Name of administrator: ULTIMUS FUND SOLUTIONS Location of administrator (city:	inistrator other than your firm "yes," respond to questions questions (b) through (f) sep mation: 1 Record(s) Filed is "yes," respond to question is questions (b) through (f) s ity, state and country): State: Ohio	(b) through (f) below. If the <i>private fund</i> us parately for each administrator. I. Is (b) through (f) below. If the <i>private fund</i> is eparately for each administrator. Country:	es more than one

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

(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,

100%

respond "not applicable."

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

Yes No

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

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

No Information Filed

SECTION 7.B.(2) Private Fund Reporting

No Information Filed

Item 8 Participation or Interest in Client Transactions

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

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

Pro	priet	ary Interest in <i>Client</i> Transactions				
Α.	Do y	you or any related person:	Yes	No		
	(1)	buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?	\circ	\odot		
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	\odot	О		
	(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))?	•	О		
Sale	es In	terest 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 <i>client</i> 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?	•	О		
	(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	ent or Brokerage Discretion				
C.	Do y	you or any related person have discretionary authority to determine the:	Yes	No		
	(1)	securities to be bought or sold for a <i>client's</i> account?	\odot	\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?	\odot	\circ		
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	О	\odot		
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	•		
E.	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 <i>related persons</i> ?	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?	•	o		
	(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?	•	O		
н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	\odot	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)?	•	О		
I.	Do you or any related person, including any employee, directly or indirectly, receive compensation from any person (other than you or any related person) for client referrals?					
	In y	our response to Item 8.I., do not include the regular salary you pay to an employee.				
	8.H.	esponding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answer) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is based, at le r, on the number or amount of client referrals.	_			

n this Item,	, we ask you	น whether yoเ	ս or a <i>related</i>	person ha	s custody	of <i>client</i>	(other than	clients that	are investment	t companies	registered
inder the In	vestment C	Company Act o	of 1940) asse	ts and abo	ut vour cu	ustodial p	ractices.				

una	er une	e Investment Company Act of 1940) assets a	and about your custodial practices.		
Α.	(1)	Do you have <i>custody</i> of any advisory <i>client</i>	ts':	Yes	No
		(a) cash or bank accounts?		⊙	О
		(b) securities?		⊙	О
	you serv	r advisory fees directly from your clients' ac	C, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you counts, or (ii) a related person has custody of client assets in connection with advis vercome the presumption that you are not operationally independent (pursuant to A on.	sory	
	(2)	If you checked "yes" to Item 9.A.(1)(a) or clients for which you have custody:	(b), what is the approximate amount of <i>client</i> funds and securities and total number	er of	
		U.S. Dollar Amount T	Total Number of <i>Clients</i>		
		(a) \$ 873,037,389 ((b) 273		
	cliei rela	nts' accounts, do not include the amount of Ited person has custody of client assets in co	C and you have custody solely because you deduct your advisory fees directly from those assets and the number of those clients in your response to Item 9.A.(2). If your nection with advisory services you provide to clients, do not include the amount opense to 9.A.(2). Instead, include that information in your response to Item 9.B.(2).	our of thos	5e
В.	(1)	In connection with advisory services you p advisory <i>clients'</i> :	provide to <i>clients</i> , do any of your <i>related persons</i> have <i>custody</i> of any of your	Yes	No
		(a) cash or bank accounts?		\odot	\circ
		(b) securities?		\odot	\circ
			s of how you answered Item 9.A.(1)(a) or (b). (b), what is the approximate amount of <i>client</i> funds and securities and total number e <i>custody</i> :	er of	
		U.S. Dollar Amount T	Total Number of <i>Clients</i>		
		(a) \$ 169,006,717 ((b) 251		
C.	•	ou or your <i>related persons</i> have <i>custody</i> of o	client funds or securities in connection with advisory services you provide to clients,	, chec	k all
			tements at least quarterly to the investors in the pooled investment vehicle(s) you	V	
	(2)	An <i>independent public accountant</i> audits a financial statements are distributed to the	annually the pooled investment vehicle(s) that you manage and the audited investors in the pools.	V	
	(3)	An independent public accountant conduct	s an annual surprise examination of client funds and securities.	$\overline{\mathbf{v}}$	
	(4)	An independent public accountant prepare related persons are qualified custodians fo	es an internal control report with respect to custodial services when you or your or client funds and securities.		
	exa	mination or prepare an internal control repo	t in Section 9.C. of Schedule D the accountants that are engaged to perform the audort. (If you checked Item 9.C.(2), you do not have to list auditor information in Sect mation with respect to the private funds you advise in Section 7.B.(1) of Schedule E	ion 9.	C.
D.		you or your <i>related person(s)</i> act as qualifie nts?	ed custodians for your <i>clients</i> in connection with advisory services you provide to	Yes	No
	(1)	you act as a qualified custodian		O	\odot
	(2)	your related person(s) act as qualified cust	todian(s)	\circ	\odot
	-		d persons that act as qualified custodians (other than any mutual fund transfer ager ified in Section 7.A. of Schedule D, regardless of whether you have determined the		ed

person to be operationally independent under rule 206(4)-2 of the Advisers Act.

- E. If you are filing your *annual updating amendment* and you were subject to a surprise examination by an *independent public accountant* during your last fiscal year, provide the date (MM/YYYY) the examination commenced: 08/2021
- F. If you or your related persons have custody of client funds or securities, how many persons, including, but not limited to, you and your related persons, act as qualified custodians for your clients in connection with advisory services you provide to clients?

SECTION 9.C. Independent Public Accountant

audit		t you manage, or prep	,	ged to perform a surprise examination, per rt. You must complete a separate Schedule		
(1)	Name of the <i>independent public ac</i> PLANTE & MORAN, PLLC	countant:				
(2)	The location of the independent pu	blic accountant's offic	e responsible for the service	s provided:		
	Number and Street 1: 10 SOUTH RIVERSIDE PLAZA		Number and Street 2	: :		
	City:	State:	Country:	ZIP+4/Postal Code:		
	CHICAGO	Illinois	United States	60606		
					Yes	No
(3)	Is the independent public accounta	<i>int</i> registered with the	Public Company Accounting	Oversight Board?	\odot	\circ
	If "yes," Public Company Accountin 166	ng Oversight Board-As	signed Number:			
(4)	If "yes" to (3) above, is the <i>indepe</i> . Oversight Board in accordance with	•	nt subject to regular inspect	ion by the Public Company Accounting	•	0
(5)	The independent public accountant	is engaged to:				
	A. \blacksquare audit a pooled investment vel					
	B. ☑ perform a surprise examination C. ☐ prepare an internal control re					
	c. E prepare an internal control re	porc				
(6)	Since your last <i>annual updating am</i> investment vehicle or that examine	•		ndependent public accountant that audited	the po	oled
	⊙ Yes					
	C No					
	C Report Not Yet Received					
	f you check "Report Not Yet Receive ccountant's report is available.	d", you must promptl	y file an amendment to your	Form ADV to update your response when t	he	

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?

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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

No Information Filed

Item 11 Disclosure Information

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

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

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.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? For "yes" answers to the following questions, complete a Criminal Action DRP: A. 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, foreid (2) been charged with any felony? If you are registered or registering with the SEC, or if you are reporting as an exempt reporting at an exempt reporting involving: investments or an investment-related business, or any fraud, false statement property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit (2) been charged with a misdemeanor listed in Item 11.B.(1)? If you are registered or registering with the SEC, or if you are reporting as an exempt reporting at an exempt reporting at an exempt reporting and exempt reporting at an exempt reporting at an exempt reporting and exempt reporting and exempt reporting at an exempt reporting at an exempt reporting and exempt reporting at an exempt reporting and exempt reporting at an exem	·		
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 A. 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, foreid (2) been charged with any felony? If you are registered or registering with the SEC, or if you are reporting as an exempt reported Item 11.A.(2) to charges that are currently pending. B. 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, foreid involving: investments or an investment-related business, or any fraud, false statemen property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit (2) been charged with a misdemeanor listed in Item 11.B.(1)? If you are registered or registering with the SEC, or if you are reporting as an exempt reported Item 11.B.(2) to charges that are currently pending. Eor "yes" answers to the following questions, complete a Regulatory Action DRP: Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: found you or any advisory affiliate to have been involved in a violation of SEC or CFTC found you or any advisory affiliate to have been a cause of an investment-related bus business denied, suspended, revoked, or restricted? entered an order against you or any advisory affiliate in connection with investment-related from any activity? D. Has any other federal regulatory agency, any state regulatory agency, or any foreign finance (1) ever found you or any advisory affiliate to have been involved in a violation of investment or found you or any advisory affiliate to have been involved in a violation of investment found you or any advisory affiliate to have been a cause of an investment-relate business denied, suspended, revoked, or restricted? 		О	⊙
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involving: investments or an <i>investment-related</i> business, or any fraud, false statemed property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit (2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)? If you are registered or registering with the SEC, or if you are reporting as an exempt reporting 11.B.(2) to charges that are currently pending. For "yes" answers to the following questions, complete a Regulatory Action DRP: C. Has the SEC or the Commodity Futures Trading Commission (CFTC) ever: (1) found you or any advisory affiliate to have made a false statement or omission? (2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC (3) found you or any advisory affiliate to have been a cause of an investment-related bus business denied, suspended, revoked, or restricted? (4) entered an order against you or any advisory affiliate in connection with investment-related (5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any from any activity? D. Has any other federal regulatory agency, any state regulatory agency, or any foreign finance (1) ever found you or any advisory affiliate to have made a false statement or omission, (2) ever found you or any advisory affiliate to have been involved in a violation of investment-related business denied, suspended, revoked, or restricted?			
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(2) ever found you or any advisory affiliate to have been involved in a violation of investre(3) ever found you or any advisory affiliate to have been a cause of an investment-relate business denied, suspended, revoked, or restricted?	ancial regulatory authority:		
(3) ever <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-relate</i> business denied, suspended, revoked, or restricted?	, or been dishonest, unfair, or unethical?	0	\odot
business denied, suspended, revoked, or restricted?	stment-related regulations or statutes?	0	\odot
(4) in the past ten years, entered an order against you or any advisory affiliate in connec	ted business having its authorization to do	О	•
	ection with an investment-related activity?	0	⊙
(5) ever denied, suspended, or revoked your or any advisory affiliate's registration or lice advisory affiliate, by order, from associating with an investment-related business or r activity?		o	•

E.	Has any self-regulatory organization or commodities exchange ever:		
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	\odot
	(2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the SEC)?	О	⊙
	(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?	О	•
	(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?		•
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?	c	•
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:		
н.	(1) Has any domestic or foreign court:	Yes	No.
	(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	0	\odot
	(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	0	•
	(c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any advisory affiliate by a state or foreign financial regulatory authority?	О	⊙
	(2) Are you or any advisory affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?	0	•

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	1
A.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	\circ	\circ	
If "y	res," 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?	О	О	
	(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?	О	О	
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?	О	С	
	(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
 - 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? $^{\circ}$ Yes $^{\circ}$ 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.
SEGALL, RALPH, MARVIN	I	CHIEF INVESTMENT OFFICER	07/1994	NA	Y	N	1829733
HILDEBRANDT, PHILIP, LEON	I	CHIEF EXECUTIVE OFFICER	10/2006	NA	Y	N	2669074
LYTHBERG, PAUL, ALAN	I	CHIEF COMPLIANCE OFFICER & CHIEF OPERATING OFFICER	01/2013	NA	Υ	N	4343712
CI US HOLDINGS INC.	DE	OWNER	04/2021	E	Υ	N	35-2679129
GOLDHABER, CAROLYN, B	I	CHIEF FINANCIAL OFFICER	04/2021	NA	Y	N	7377426

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	Status	Date Status	Ownership	Control	PR	CRD No. If None: S.S.
(Individuals: Last Name, First		Which		Acquired	Code	Person		No. and Date of Birth,
Name, Middle Name)		Interest is		MM/YYYY				IRS Tax No. or
		Owned						Employer ID No.
CI FINANCIAL CORP	FE	CI US	OWNER & PARENT	04/2021	E	Υ	N	83269 4699
		HOLDINGS	COMPANY CI US					
		INC.	HOLDINGS INC.					

Schedule D - Miscellaneous

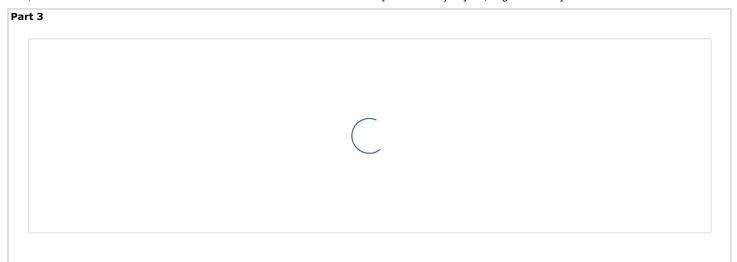
You may use the space below to explain a response to an Item or to provide any other information.

Notes to Item 5.C(1): The 11 clients for whom we exclude from RAUM but provide investment advisory services are the UMA Model programs. Notes to Item 5.J: The UMA Model programs are included in our Assets Under Advisement (AUA) but excluded in our RAUM and total \$433,202.784. Notes to Item 9.A.(2): Due to the Feb 2017 SEC guidance on Custody, the US Dollar Amount and Total Number of Clients includes Custody due to third party SLOAs. General note regarding ownership: On April 30, 2021, Segall Bryant & Hamill became a wholly owned subsidiary of CI Financial Corp. ("CI") (TSX: CIX; NYSE: CIXX), a diversified global asset and wealth management company.

Schedule R	
	No Information Filed

DRP Pages	
CRIMINAL DISCLOSURE REPORTING PAGE (ADV)	
No Information Filed	
REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)	
No Information Filed	
CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)	
No Information Filed	

Part 2 Exemption from brochure delivery requirements for SEC-registered advisers SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to all of your advisory clients, you do not have to prepare a brochure. Yes No Are you exempt from delivering a brochure to all of your clients under these rules? \circ ⊚ If no, complete the ADV Part 2 filing below. Amend, retire or file new brochures: **Brochure ID Brochure Name** Brochure Type(s) 95699 SEGALL BRYANT & HAMILL ADV MARCH Individuals, High net worth individuals, Pension 29, 2022 plans/profit sharing plans, Foundations/charities, Government/municipal, Other institutional, Private funds or pools, Wrap program, Financial Planning Services, Other



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 03/29/2022

PHILIP L. HILDEBRANDT Printed Name:

Title:

PHILIP L. HILDEBRANDT

CHIEF EXECUTIVE OFFICER

Adviser CRD Number:

106505

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:

106505

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Form ADV Part 2A - Brochure ITEM 1 – COVER PAGE

March 29, 2022

Segall Bryant & Hamill, LLC

540 West Madison Street, Suite 1900 Chicago, IL 60661 312-474-1222 / 800-836-4265

www.sbhic.com

This Brochure provides information about the qualifications and business practices of Segall Bryant & Hamill, LLC ("SBH"). If you have any questions about the contents of this Brochure, please contact us at 312-474-1222 or 800-836-4265 and/or contactus@sbhic.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Segall Bryant & Hamill, LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information to assist you in determining whether to hire or retain an Adviser. Additional information about Segall Bryant & Hamill, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 - MATERIAL CHANGES

This section discusses specific material changes that have been made to this Brochure since the other than annual update of our Brochure on May 12, 2021. It does not describe other modifications to this Brochure, such as updates to dates and numbers, stylistic changes or clarifications.

The following material changes since the other than annual amendment update filed on May 12, 2021 are:

- Established the Segall Bryant & Hamill Private Opportunities Fund III, LP
- Established the Segall Bryant & Hamill International Fund, LP
- Established the following Collective Investment Trusts:
 - Segall Bryant & Hamill All Cap Trust
 - Segall Bryant & Hamill Small Cap Core Trust
 - Segall Bryant & Hamill Small Cap Growth Trust
 - Segall Bryant & Hamill SMID Cap Trust

The following material change was previously disclosed in the other than annual amendment update filed on May 12, 2021:

On April 30, 2021, CI Financial closed on its acquisition of Segall Bryant & Hamill. The
acquisition provides the backing of a growth oriented strategic partner in CI Financial, an
independent company offering global asset management and wealth management
advisory services based in Toronto, Canada.

Currently, our Brochure can be requested by contacting Segall Bryant & Hamill at 312-474-1222 or contactus@sbhic.com. Our Brochure is also available on our web site, www.sbhic.com, free of charge.

Additional information about Segall Bryant & Hamill, LLC is also available via the SEC's web site at www.adviserinfo.sec.gov. The SEC's web site provides information about any persons affiliated with Segall Bryant & Hamill, LLC who are registered, or are required to be registered, as investment adviser representatives of Segall Bryant & Hamill, LLC.

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ITEM 4 - ADVISORY BUSINESS

As of April 30, 2021, Segall Bryant & Hamill ("SBH") is a wholly-owned subsidiary of CI US Holdings INC., a subsidiary of CI Financial Corp. (CI or CI Financial) (TSX:CIX; NYSE:CIXX). Neither CI US Holdings nor CI Financial has a role in the day-to-day management of SBH. See additional disclosures in Item 10.

Segall Bryant & Hamill, LLC ("SBH") is a registered investment advisor established in 1994. SBH provides professional portfolio management of domestic and international equity, domestic fixed income and balanced portfolios, and alternative investments, to clients which include foundations, endowments, corporations, public funds, multi-employer plans and wealth management clients. Our client base is geographically diverse with investors in the U.S. and several foreign countries. SBH is owned by CI U.S. Holdings, which is owned by CI Financial Corp., an independent company offering global asset management and wealth management advisory services based in Toronto, Canada.

SBH is headquartered in Chicago, Illinois, with offices in Denver, Colorado; Naples, Florida; Chesterfield, Missouri; and Ardmore, Pennsylvania. SBH provides fee-based investment management of equity, fixed income and alternative investment portfolios to different client types on a discretionary and non-discretionary basis.

SBH manages client portfolios utilizing a diverse offering of investment strategies listed below. For more information on SBH's strategies, please visit www.sbhic.com. These strategies are typically implemented through a separately managed account for clients, although certain strategies listed are also available through the firm's proprietary family of mutual funds, the Segall Bryant & Hamill Funds, private limited partnerships or through a commingled investment vehicle. Clients should read the prospectus or offering memoranda for these investment vehicles before investing.

EQUITY STRATEGIES	FIXED INCOME STRATEGIES	OTHER INVESTMENT STRATEGIES
Small Cap	Short Term Fixed Income	Balanced
Small Cap Value	Short Term Plus Fixed Income	Alternative Investments (fund-
		of-funds portfolios)
Small Cap Value Select	Intermediate Fixed Income	Workplace Equality Index**
Small Cap Growth	Tax Advantaged Fixed Income	
Smid Cap	Municipal - Short/Intermediate	
Workplace Equality	Enhanced Intermediate	
	Municipal	
All Cap	Core Fixed Income	
Select Equity	Core Plus Fixed Income	
Emerging Markets Small Cap	Quality High Yield Fixed Income	
Emerging Markets	Long Term – Liability Driven	
	Investing Fixed Income	

EQUITY STRATEGIES	FIXED INCOME STRATEGIES	OTHER INVESTMENT STRATEGIES
International Small Cap		
Fundamental International Small		
Cap		
Global All Cap		

^{*} The Workplace Equality Index®, is an index of companies that support equal opportunity for all employees, including lesbian, gay, bisexual and transgender ("LGBT") individuals.

Registered Investment Companies

SBH provides investment advice to domestic and international mutual funds under the Segall Bryant & Hamill Trust. SBH also sub-advises several other mutual funds (each, a "Fund," and collectively, the "Funds"). SBH manages the assets of the Funds in accordance with the Funds' investment objectives, policies and restrictions as set forth in its registration statements. If these Funds are held in a client separate account, the value of the investment in the Funds is excluded from the billing value for the purpose of calculating the client's periodic fee due SBH. The services that SBH provides to the Funds can present conflicts of interest as the firm can be incentivized to use the Funds based on compensation rather than the client's needs. To help manage that conflict of interest, SBH has implemented various controls including maintaining a Code of Ethics which details the firm's fiduciary duties, monitoring of portfolio holdings versus client objectives, along with the controls mentioned above. This document should not be considered an offering document for the Funds. Please see the respective Fund's offering materials such as the Prospectus, Statement of Additional Information and other reports to investors for complete disclosures relating to each Fund.

Collective Investment Trusts

SBH provides investment advice to collective investment trusts. The Segall Bryant & Hamill International Small Cap Trust, Segall Bryant & Hamill Emerging Markets Trust, Segall Bryant & Hamill Emerging Markets Small Cap Trust, Segall Bryant & Hamill Quality High Yield Trust, Segall Bryant & Hamill Small Cap Cor Trust, Segall Bryant & Hamill Small Cap Cor Trust, Segall Bryant & Hamill Small Cap Growth Trust and the Segall Bryant & Hamill SMID Cap Trust (the "SBH Trusts") are trusts for the collective investment of assets or participating tax qualified pension and profit-sharing plans and related trusts, and governmental plans as more fully described in the Declaration of Trust. As bank collective trusts, the SBH Trusts are exempt from registration as an investment company. The SBH Trusts are managed by SEI Trust Company, the trustee, based on the investment advice of SBH, the investment adviser to the trusts. If these SBH Trusts are held in a client account, the value of the investment in the SBH Trusts is excluded from the billing value for the purpose of calculating the client's periodic fee due SBH.

Private Funds

SBH provides investment advice to several privately offered non-registered investment vehicles:

- Segall Bryant & Hamill Emerging Markets Small Cap Fund, LP
- Segall Bryant & Hamill Emerging Markets Fund, LP; and a related offshore fund

- International Small-Cap Equity Fund, LLLP
- Segall Bryant & Hamill Private Opportunities Fund, LP; and a related offshore fund (no longer accepting new investors)
- Segall Bryant & Hamill Private Opportunities Fund 2020, LP; and a related offshore fund
- Segall Bryant & Hamill Private Opportunities Fund III, LP; and a related offshore fund
- Segall Bryant & Hamill International Fund, LP
- SBH Global Discovery Fund, LLC; and a related offshore fund (currently in liquidation)

Segall Bryant & Hamill Emerging Markets Small Cap Fund, LP invests in marketable securities, primarily common stocks with small market capitalizations tied economically to emerging market countries. The Segall Bryant & Hamill Emerging Markets Fund, LP invests in marketable securities, primarily common stocks tied economically to emerging market countries. Segall Bryant & Hamill Emerging Markets Offshore Fund, LTD will invest all of its assets, except those assets needed for cash-management purposes, into Segall Bryant & Hamill Emerging Markets Fund, LP. The International Small-Cap Equity Fund, LLLP primarily invests in international equity securities following the fundamental international small cap strategy. The Segall Bryant & Hamill Private Opportunities Fund, LP and related offshore fund, and the Segall Bryant & Hamill Private Opportunities Fund 2020, LP and related offshore fund, and Segall Bryant & Hamill Private Opportunities Fund III, LP; and a related offshore fund seek primarily to invest in non-traditional asset classes including private equity strategies, private debt strategies, and real asset strategies. The Segall Bryant & Hamill International Fund, LP invests primarily in equity securities of foreign companies located outside of the United States and tied to developed countries.

When private funds are held in a client account, the value of the investment in private funds is excluded from the billing value for the purpose of calculating the client's periodic fee due to SBH.

Wrap Fee Programs

SBH provides investment strategies to accounts under wrap fee programs sponsored by other firms or "wrap sponsors". The wrap sponsors determine the suitability of the investment strategy as well as the suitability of the wrap structure and fee for each client. They recommend and assist clients in selecting an appropriate SBH investment strategy, taking into account their financial situation and investment objectives. SBH's role is to manage the client's account according to the strategy selected. In a wrap fee program, the wrap sponsor provides investment advisory, execution and custodial services to clients in return for an all-inclusive—or "wrap"—fee paid to the sponsor. SBH receives a portion of the wrap fee for managing these strategies. SBH will allow reasonable investment restrictions if they do not differ materially from a strategy's investment objectives. Clients who impose investment restrictions should be aware that the performance of their accounts may differ from that of the investment strategies not subject to investment restrictions.

Unified Managed Account "UMA" Programs (Model Portfolio Provider)

SBH provides investment strategies via model portfolios to other investment advisers. As the model portfolio provider, SBH designs, monitors and updates the portfolio. The investment advisers may then implement the model portfolio for their clients and adjust the model portfolio as recommended by SBH. Model portfolio providers may grant shared trading authority to SBH or "dual-discretion" over the clients' assets, whereby SBH has discretion to execute trades on behalf of the clients.

Separate Managed Account Dual Contract

Under these programs, an adviser has a contract with its client to perform investment management and possibly custodian services. SBH may establish a contract directly with the client or contract with the adviser on the client's behalf. SBH may from time to time establish other such relationships.

Managed Mutual Fund Accounts

SBH also provides advice to client accounts that are limited to shares in mutual funds. Where a client account is invested solely in shares of the mutual funds (non-Segall Bryant & Hamill Mutual Funds), SBH often charges the client a fee with respect to the special accounting, reporting and investment advisory services rendered to the client. Clients should be aware that, in addition to fees paid to SBH, they are paying an investment management fee to the adviser of the mutual fund which is disclosed in a Fund's Prospectus. Such charges, fees and commissions are exclusive of and in addition to SBH's fee, and SBH does not receive any portion of these commissions, fees and costs.

Wealth Management Services

SBH constructs portfolios for its wealth management clients using a mix of individual stocks, bonds, mutual funds and alternative investments. Each client's asset allocation is determined by their specific objectives and unique circumstances. SBH's investment approach begins with a clear and thorough understanding of each client's objectives, time horizon, risk profile and income needs. Each client works directly with a portfolio manager whose job it is to construct a portfolio tailored to each client's needs and to communicate regularly with the client.

As part of SBH's wealth management services, SBH also offers goals-based financial planning for clients. For clients who agree to a financial planning engagement, the firm provides the following services dependent on the data provided by the client and their needs.

- An assessment of the probability of reaching various financial goals. SBH utilizes stress
 testing of possible scenarios to assess the probability that a client will have sufficient
 assets to reach financial goals that are personal to each client.
- Based on data provided by each client, the firm seeks to analyze and recommend
 actions steps regarding their social security options, retirement planning, education
 planning, and both family and philanthropic gift planning.

• SBH also endeavors to work with each client's estate and tax planning professionals to guide clients on the transfer of assets, titling, asset placement, and tax efficiency planning of an investment portfolio as it relates to a client's overall tax situation.

The firm relies on a client to provide detailed and accurate data for all of our financial planning and it is the responsibility of clients to introduce us to estate and tax professionals with whom they are currently working to address all wealth management issues that are relevant to a given client.

IRA Rollover Recommendations

For purposes of complying with the Department of Labor Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Legal Actions and Class Actions

SBH does not take responsibility for filing class action claims on behalf of its clients. However, regarding class actions, SBH has retained an outside company to provide an option for clients to electronically file class action claims. Fees for this service are typically on a contingency basis, as a percentage of the proceeds received.

Assets Under Management

As of December 31, 2021, SBH's total assets under management were \$25,642,773,736 (\$25,590,363,809 discretionary and \$52,409,927 non-discretionary). There are \$433,202,784 million of assets under advisement ("AUA") in Model UMA assets.

ITEM 5 - FEES AND COMPENSATION

All fees are subject to negotiation. The extent and nature of the advisory services that SBH provides will vary depending on the specific arrangements it makes with each client. As a result, SBH's fees will differ among its client accounts due to several factors such as the size of the account, relationships to other accounts, competitive pricing conditions at inception, the historical or projected nature of trading for the account, and the extent of supplemental client services provided to the account.

Clients elect to be billed directly for fees or authorize their custodian to directly debit fees from client accounts.

Under the terms of SBH's standard form investment advisory agreements, the compensation of SBH is generally payable quarterly in advance. Fees are generally calculated on market value as of the last business day of the quarter. The standard form agreements do not have fixed termination or renewal dates but do provide for the termination of SBH's services to the client by notice from either the client or SBH to the other within 30 days' written notice. Generally, if at the time of termination and subject to the required notice period, SBH has not fully earned a fee amount prepaid by the client, the unearned portion (determined by proration on a daily basis) is refunded to the client. Accounts initiated or terminated during a calendar quarter will be charged a pro rata fee.

In addition to the schedules of fees set forth below that apply to new clients, there are in effect fee schedules with some clients that may differ. From time to time, special requirements of clients will result in advisory contracts with terms or fee arrangements differing from those set forth in SBH's standard forms. There are circumstances under which fees, including performance-based fee arrangements in compliance with Securities and Exchange Commission Rule 205-3 and applicable state securities laws and regulations, if any, may be negotiated. The minimum account size noted below may be waived or reduced when, for example, a new account is expected to grow rapidly in size, a relationship exists with a current client of SBH, or for other reasons, at the discretion of SBH. SBH generally offers a discount from its standard fee schedules for accounts of persons associated with SBH or members of their families.

SBH's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. SBH strives to keep their fees to a minimum. In addition to SBH's fees, clients may incur certain charges imposed by custodians, brokers, third-party investment and other third parties, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. In circumstances where a client's account includes mutual funds (not Advised by SBH), clients should be aware that they are paying an investment management fee to the adviser of the mutual fund, which is disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to SBH's fee, and SBH does not receive any portion of these commissions, fees and costs.

In selecting or recommending share classes in such investments for Client accounts, it is the firm's policy to identify the eligible share class which is expected to generate the lowest overall fees for the Client account, taking into consideration any third-party intermediary fee, trading or commission charges that may also be applicable for that particular share class. Such determinations will be based on the Client's investment objectives, the performance and characteristics of the product strategy under consideration, and the available investment alternatives.

The Brokerage Practices section further describes the factors that SBH considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

INVESTMENT STYLE	MANAGEMENT FEE*	MIN. SEPARATE ACCOUNT SIZE
Core Equity		
All Cap and Balanced	0.55% - First \$25 Million	\$1 Million
	0.45% - Next \$25 Million	
	0.30% - Over \$50 Million	
Select Equity	0.55% - First \$25 Million	\$1 Million
	0.45% - Next \$25 Million	
	0.30% - Over \$50 Million	
Global All Cap	0.65% - First \$50 Million	\$1 Million
	0.55% - Next \$50 Million	
	0.50% - Over \$100 Million	
Workplace Equality	0.50% - First \$25 Million	\$1 Million
-	0.45% - Next \$25 Million	
	0.40% - Over \$50 Million	
Smid Cap	0.70% - First \$50 Million	\$1 Million
·	0.60% - Next \$50 Million	·
	0.55% - Over \$100 Million	
Small Cap	0.80% - First \$50 Million	\$1 Million
•	0.70% - Next \$50 Million	·
	0.65% - Over \$100 Million	
Growth Equity		
Small Cap Growth	0.80% - First \$50 Million	\$1 Million
•	0.70% - Next \$50 Million	·
	0.65% - Over \$100 Million	
Value Equity		
Small Cap Value	0.80% - First \$50 Million	\$1 Million
	0.70% - Next \$50 Million	
	0.65% - Over \$100 Million	
Small Cap Value Select	0.80% - First \$50 Million	
	0.70% - Next \$50 Million	\$1 Million
	0.65% - Over \$100 Million	
International Equity		
International Small Cap	0.80% - First \$50 Million	\$50 Million
·	0.70% - Next \$50 Million	
	0.65% - Over \$100 Million	
Fundamental International Small Cap	0.90% - First \$50 Million	\$50 Million
·	0.80% - Next \$50 Million	
	0.75% - Over \$100 Million	
International Smid Cap	0.90% - First \$50 Million	\$50 Million

INVESTMENT STYLE	MANAGEMENT FEE*	MIN. SEPARATE ACCOUNT SIZE
	0.80% - Next \$50 Million	
	0.75% - Over \$100 Million	
Emerging Markets	0.70% - First \$50 Million	\$50 Million
	0.60% - Next \$50 Million	
	0.55% - Over \$100 Million	
Emerging Markets Small Cap	0.80% - First \$50 Million	\$50 Million
	0.70% - Next \$50 Million	
	0.65% - Over \$100 Million	
Fixed Income		
Intermediate	0.25% - First \$25 Million	\$5 Million
	0.20% - Next \$25 Million	
	0.15% - Over \$50 Million	
Core	0.25% - First \$25 Million	\$5 Million
	0.20% - Next \$25 Million	*
	0.15% - Over \$50 Million	
Core Plus	0.25% - First \$25 Million	\$5 Million
30.01.00	0.20% - Next \$25 Million	φοο
	0.15% - Over \$50 Million	
Quality High Yield	0.50% - First \$10 Million	\$5 Million
Canada and an analysis and an	0.45% - Next \$10 Million	*
	0.40% - Over \$20 Million	
Liability-Driven Investing	0.25% - First \$25 Million	\$5 Million
,	0.20% - Next \$25 Million	
	0.15% - Over \$50 Million	
Short Term	0.20% - First \$25 Million	\$5 Million
	0.15% - Over \$25 Million	, -
Short Term Plus	0.25% - First \$25 Million	\$5 Million
	0.20% - Over \$25 Million	·
Tax Advantaged Fixed Income	0.25% - First \$5 Million	\$250,000
	0.20% - Over \$5 Million	,,
Municipal - Short/Intermediate	0.25% - First \$5 Million	\$250,000
, ,	0.20% - Over \$5 Million	,,
Municipal – Enhanced Intermediate	0.25% - First \$5 Million	\$250,000
	0.20% - Over \$5 Million	+
Wealth Management		
Equity and Balanced	1.00% - First \$3 Million	\$1 Million
_q, and samened	0.75% - Next \$7 Million	φ± 111011
	0.50% Over \$10 million	
	\$10,000 annual minimum fee	
Fixed Income	0.50% - All balances	\$1 Million
inca modific	\$10,000 annual minimum fee	γ± IVIIIIOII
	910,000 annual miliminani icc	

^{*} All fees noted represent institutional strategies unless specifically stated otherwise.

In most cases, each of the foregoing schedules of fees is applied to the fair market value of the assets under management by SBH, as reasonably determined by SBH, as of the end of each quarterly period.

Wrap Fee Programs

The wrap sponsor contracts with the client to perform investment management and/or custodial services. Clients pay a single all-inclusive fee quarterly in advance to the wrap sponsor based on assets under management. From the all-inclusive fee, the sponsor will pay SBH a management fee. The wrap fee is set forth in the sponsor's brochure. The fees payable to SBH are negotiable but will typically be less than the amounts set forth for a particular investment strategy above due to the reduced services required for these accounts.

Unified Managed Account "UMA" Program (Model Portfolio Provider)

The fees that SBH receives from third parties for providing its model portfolios are subject to negotiation but will typically be less than the amounts set forth for a particular investment strategy above due to the reduced services required for these accounts.

Separate Managed Account Dual Contract Programs

In dual contract programs, the end client pays a separate quarterly fee to SBH based on the market value of the account. The fees payable to SBH are negotiable but will generally not exceed the amounts set forth for a particular investment strategy above.

Private Funds

As is more fully described in the offering materials for the private funds, SBH receives a management fee from each of the private funds. Generally, a management fee is accrued in arrears on a monthly basis to be paid either monthly or quarterly and at a rate of one-twelfth of the annual fee. The standard management fee for the private funds is up to 1.2% per annum. Investors may also elect to pay a performance fee. SBH reserves the right to apply a different management fee and/or performance fees to different investors and to waive any management fee and/or performance fees in whole or in part at its discretion.

Registered Investment Companies

SBH receives annual fees from the SBH Funds for investment advisory and administration services provided to the Funds. SBH is paid a monthly management fee on average daily net assets at an annual rate ranging up to 1.00%. SBH serves as the sub-adviser to mutual funds where it receives a fee from the adviser for its services. Specific advisory fees and expense-related information can be found in each Fund's Prospectus, Statement of Additional Information and annual report.

Collective Investment Trusts

SBH receives a management fee from the SBH Trusts for its investment advisory services. The trustee of the SBH Trusts pays SBH a monthly management fee based on the average daily net assets of up to 1.25%. Specific advisory fees and expense-related information can be found in the SBH Trusts Disclosure Memorandum.

ITEM 6 - PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

In some cases, SBH has entered into performance fee arrangements with qualified clients: such fees are subject to individualized negotiation with each such client. SBH will structure any performance or incentive fee arrangement subject to Section 205(a)(1) of the Investment Advisers Act of 1940, as amended, (the "Advisers Act") in accordance with the available exemptions thereunder, including the exemption set forth in Rule 205-3. In measuring clients' assets for the calculation of performance-based fees, SBH shall include realized and unrealized capital gains and losses. Performance based fee arrangements create an incentive for SBH to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee-paying accounts over other accounts in the allocation of investment opportunities. SBH has procedures designed and implemented to ensure that all clients are treated in a fair and equitable manner, and to prevent this conflict from influencing the allocation of investment opportunities among clients.

Performance-based fees also create an incentive for SBH to overvalue investments that lack a market quotation. To address this possible conflict, SBH has adopted policies and procedures that require our firm to "fair value" any investments that do not have a readily ascertainable value.

Certain SBH private funds charge performance fees. Refer to the offering materials of the private funds for further information.

<u>Side-by-Side Management:</u>

In some cases, SBH manages clients in the same or similar strategies. This gives rise to potential conflicts of interest if the funds and accounts have, among other things, different objectives, benchmarks or fees. For example, potential conflicts arise in the following areas:

- The portfolio manager must allocate time and investment ideas across funds and accounts,
- Funds' or accounts' orders do not get fully executed,
- Trades get executed for an account that may adversely impact the value of securities held by a fund,
- There will be cases where certain accounts or funds receive an allocation of an investment opportunity when other accounts do not, and/or,
- Trading and securities selected for a particular fund or account can cause differences in the performance of different accounts or funds that have similar strategies.

SBH has adopted trade allocation policies and procedures and monitors such transactions to help ensure SBH is not favoring Funds or accounts over each other as well as to help ensure fair and equitable treatment over time for both the Funds and accounts. During periods of unusual market conditions, SBH may deviate from its normal trade allocation practices. There can be no assurance, however, that all conflicts have been addressed in all situations.

ITEM 7 - TYPES OF CLIENTS

SBH provides portfolio management services to the following types of clients:

- Banks or thrifts
- Charitable institutions
- Corporate pension & profit-sharing plans
- Corporations or business entities
- Employed persons ("Keogh" plans)
- Foundations & endowments
- Individuals
- Individual Retirement Accounts
- Jointly trusted benefit
- State and local governments (including pension funds)
- Partnerships
- Private investment funds
- Retirement plans
- Taft-Hartley plans
- Trusts, estates or custodians
- Registered Investment Companies
- Private Funds

The minimum conditions for opening or maintaining an account are as follows:

Institutional Relationships: Minimum relationship size based on investment strategy

as is noted above.

Individual Relationships: Minimum relationship size of \$1,000,000.

SMA Wrap Fee Accounts: Minimum \$100,000.

The minimum account size may, however, be modified by mutual agreement with a client as determined on a case- by-case basis. The investment objective, strategy or guidelines of the account, the expectation of future cash inflows into the account for new investment, the present or expected business relationship with the client, and similar considerations can affect the minimum initial account size agreed upon.

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Research Process

SBH uses a variety of investment strategies and techniques in managing accounts, both qualitative and quantitative, with emphasis on the use of proprietary investment research.

Proprietary research involves analysis that is conducted on the business and characteristics of specific companies and when forming investment decisions. Proprietary research can include interviews with company management, customers, suppliers and industry analysts, analysis of a company's historical financial statements, and creation of financial models of the company or issuer's projected financial performance, among other things. SBH makes substantial use of various quantitative screening techniques through its own proprietary models. The research professionals at SBH consider environmental, social and corporate governance ("ESG") policies of the issuing entities when forming investment decisions.

For fundamental research focused portfolios, SBH's investment approach is based on the prospects for the issuing entity (for example, a company or governmental unit), which may be assessed by reference to its prior financial history and SBH's knowledge of the industry. SBH's professional staff will reach a judgment on the value of the security relative to its current price, seeking to buy those that are selling at less than SBH believes the value to be or will be. SBH's professional staff will consider a variety of factors in reaching these conclusions, which include (but are not limited to), reviewing the company's financial history, interviews with management, discussions with other professional analysts and discussions with other industry participants.

With respect to its quantitatively driven portfolios, SBH's investment philosophy emphasizes a systematic, diversified and risk-aware process. SBH believes that a portfolio of companies with traditional value characteristics (tilted to particularly attractive markets in the case of the Emerging Markets portfolio), coupled with positive momentum factors, will outperform the market over the long term.

Investment Strategies

All Cap Equity and Select Equity

SBH's All Cap equity and Select Equity philosophies are founded on the belief that excess returns are achieved by investing in high-quality companies selling at reasonable prices. Using a low turnover approach to active management, SBH seeks to identify companies that have historically generated, or are positioned to generate, superior return on investment through strong management, broad resources and competitive market position.

Small and Smid Cap Core Equity

SBH's Small and Smid Cap Core Equity philosophies are founded on the belief that excess returns are achieved by investing in a combination of sustainably high Return on Invested Capital ("ROIC") and improving ROIC companies at attractive valuations. The team seeks companies that compete in niche-oriented markets, possess a sustainable competitive advantage and are led by strong management teams.

Small Cap Value and Small Cap Value Select

SBH's Small Cap Value Equity and Small Cap Value Select philosophies are is founded on the belief that excess returns are achieved by investing in companies at or near inflections in expected ROIC. Using screens to limit the universe to companies with low embedded

expectations, SBH utilizes investment processes to identify catalysts of change for improved returns while guarding for risk.

Global All Cap

SBH's Global All Cap strategy is based on the belief that the market rewards companies over time for their superior Return on Invested Capital (ROIC), and free cash flow rather than their reported earnings. SBH utilizes a bottom-up approach, which is grounded in independent fundamental research. The team seeks to construct a diversified portfolio designed to generate alpha primarily through stock selection.

Workplace Equality

SBH's Workplace Equality strategy seeks strong Environmental, Social, and Governance ("ESG") practices of companies that also meet the Adviser's Workplace Equality Screen. SBH considers a candidate company's ESG and workplace equality practices and inclusionary hiring and promotion policies because they believe these traits can enhance a company's culture, growth trajectory, and long-term financial success. In addition, the strategy is based on the belief that the market rewards companies over time for their superior Return on Invested Capital (ROIC), and free cash flow rather than their reported earnings. The strategy utilizes a bottom-up approach, which is grounded in independent fundamental research. The team seeks to construct a diversified portfolio designed to generate alpha primarily through stock selection.

Small Cap Growth

SBH's Small Cap Growth strategy is based on the belief that being early in the identification of companies with superior growth prospects and fundamental stability leads to consistent outperformance over time. The team invests in the small-cap growth companies in which they have the highest conviction.

International Small Cap

SBH's International Small Cap philosophy focuses on three main components: quantitative analysis, valuation and intelligent risk taking. SBH believes in a systematic, objective methodology that derives its advantage from unemotional, strict adherence to proven drivers of excess returns. The systemization of SBH's investment methodology also allows this rigorous investment process to be applied effectively over very broad investment universes, such as the international small cap space. Regarding valuation, SBH's equity research on international markets has demonstrated that stocks with low valuation ratios produce superior returns over more expensive stocks over time. The volatility and inefficiencies in international markets allow a systematic investor the ability to uncover and capitalize on mispricings. Lastly, SBH concentrates its focus where it can be most effective and where the largest payoff is expected, while correspondingly limiting exposure that would introduce an excessive amount of risk for the associated return. Strict adherence to its disciplines—including neutrality to region, sector and size exposure—aims to give the portfolio attractive risk/return characteristics.

Emerging Markets

SBH's Emerging Markets philosophy focuses on three main components: quantitative analysis, valuation and intelligent risk taking. SBH believes in a systematic, objective methodology that derives its advantage from unemotional adherence to proven drivers of excess returns. The systemization of SBH's investment methodology also allows this rigorous investment process to be applied effectively over very broad investment universes, such as the emerging markets all cap space. Regarding valuation, SBH's equity research on emerging markets has demonstrated that stocks with low valuation ratios may produce superior returns over more expensive stocks over time. The volatility and inefficiencies in emerging markets allow a systematic investor the ability to uncover and capitalize on mispricing's. Lastly, SBH concentrates its focus where it can be most effective and where the largest payoff is expected, while correspondingly limiting exposure which would introduce an excessive amount of risk for the associated return. Strict adherence to its disciplines—including neutrality to country and sector—aims to give the portfolio attractive risk/return characteristics.

Emerging Markets Small Cap

SBH's Emerging Markets Small Cap philosophy focuses on three main components: quantitative analysis, valuation, and intelligent risk taking. SBH believes in a systematic, objective methodology that derives its advantage from unemotional adherence to proven drivers of excess returns. The systemization of SBH's investment methodology also allows this rigorous investment process to be applied effectively over very broad investment universes, such as the emerging markets small cap space. Regarding valuation, SBH's equity research on emerging markets has demonstrated that stocks with low valuation ratios may produce superior returns over more expensive stocks over time. The volatility and inefficiencies in emerging markets allow a systematic investor the ability to uncover and capitalize on mispricing's. Lastly, SBH concentrates its focus where it can be most effective and where the largest payoff is expected, while correspondingly limiting exposure which would introduce an excessive amount of risk for the associated return. Strict adherence to its disciplines—including neutrality to country and sector—aims to give the portfolio attractive risk/return characteristics.

<u>Fundamental International Small and Smid Cap</u>

SBH's Fundamental International Small and Smid Cap approaches to stock selection are based on the belief that investing in businesses trading at a significant discount to intrinsic value leads to consistent outperformance over time. Utilizing a bottom-up approach grounded in independent fundamental research, the team constructs a portfolio designed to generate alpha primarily through stock selection.

The team's approach also reflects its belief that the best way to identify attractive investment candidates is to consider companies within its entire international small and smid cap universe. Analysts do not eliminate any industries from the research process and do not pre-judge companies based on the nature of the business but rather focus on the underlying characteristics of the business.

Intermediate Fixed Income, Core Fixed Income and Short Term Fixed Income

There are inefficiencies in the bond market created by its size, the behavior of large investors and the nature of over-the-counter trading. SBH seeks to exploit these inefficiencies using fundamental analysis to identify high-quality securities in areas generally overlooked by other managers (e.g., small issue corporates, taxable muni's and mortgages). Performance is primarily driven by bottom-up research and security selection, as opposed to market timing. SBH's processes also emphasize disciplined risk controls, sector diversification and liquidity.

Core Plus Fixed Income

SBH's Core Plus Fixed Income is a broad-market strategy, incorporating maturities from 0-30 years. The strategy invests across market sectors, including high yield securities. There are inefficiencies in the bond market created by its size, the behavior of large investors and the nature of over-the-counter trading. SBH seeks to exploit these inefficiencies using fundamental analysis to identify high-quality securities in areas generally overlooked by other managers (e.g., small issue corporates, taxable muni's, mortgages and high yield securities). Performance is primarily driven by bottom-up research and security selection, as opposed to market timing. SBH's processes also emphasize disciplined risk controls, sector diversification and liquidity.

Quality High Yield

SBH's Quality High Yield strategy invests primarily in high yield rated corporate securities. There are inefficiencies in the high yield bond market created by its size, the behavior of large investors and the nature of over-the-counter trading. SBH seeks to exploit these inefficiencies using fundamental analysis to identify high-quality securities in areas generally overlooked by other managers (e.g., small issue size, cross-over and mis-rated corporate securities). Performance is primarily driven by bottom-up research and security selection, as opposed to market timing and trading oriented strategies. SBH's processes also emphasize disciplined risk controls, sector diversification and liquidity.

Municipal Fixed Income

SBH's Municipal Fixed Income philosophy is founded on the belief that excess returns are achieved by investing in sectors and securities that offer relative value within the context of current pricing and SBH's top-down forecast. For municipal bond portfolios, SBH's emphasis is on segments of the yield curve that offer strong risk/reward characteristics and capture trading inefficiencies unique to the municipal bond market. Municipal Fixed Income portfolios can be customized to meet client's investment objectives.

Workplace Equality Index®

The Workplace Equality Index[®], is an index of companies that support equal opportunity for all employees, including lesbian, gay, bisexual and transgender ("LGBT") individuals.

<u>Segall Bryant & Hamill Private Opportunities Fund, LP, Segall Bryant & Hamill Private</u> Opportunities Fund 2020, LP, Segall Bryant & Hamill Private Opportunities Fund III, LP

The investment objective of the Segall Bryant & Hamill Private Opportunities Fund, LP, Segall Bryant & Hamill Private Opportunities Fund 2020, LP and the Segall Bryant & Hamill Private Opportunities Fund III, LP is to deliver superior long-term risk-adjusted returns that are not highly correlated with traditional asset classes by pursuing strategies across the private markets including private equity, private debt, real estate and real assets. Each Fund seeks to accomplish its objective by allocating its assets primarily among a select group of portfolio funds along with co-investment and direct investment opportunities, that are managed by individuals that SBH believes are highly talented and motivated private markets managers who combine due diligence and investment analysis expertise.

Investment Restrictions

Concentration limits on investments may be imposed to maintain a desired level of diversification in client portfolios. These limits include security-specific limits, industry limits and limits on investments in companies in the same business. The limits will vary among the different strategies. In applying industry limits to its domestic strategies, SBH may categorize certain diversified companies into more than one industry classification. A diversified company's industry classification may be determined by reviewing the company's lines of business that produce significant revenues. For related information about the Funds, see the Funds' Statement of Additional Information.

SBH's clients in the aggregate may own a significant percentage of the stock of certain companies, and in some cases the aggregate or individual percentage of an issuer that clients hold may be limited or affected by corporate restrictions, federal and state regulatory restrictions, state control statutes, or foreign country restrictions. In order to comply with such restrictions on aggregate holdings, SBH may, on occasion, be required to limit or sell a portion of clients' positions or may be unable to initiate or build a position for new clients in the stock of certain companies. In these cases, such clients' portfolios will differ from SBH's model portfolios.

Principal Investment Risks

Investing in securities involves risk of loss that clients should be prepared to bear. While SBH's investment approaches are designed to mitigate risk, there is no guarantee that clients will not lose money. Following are the various types of risk that may be present depending on the level of exposure the strategy has to a particular type of investment:

Market Risk

The price of an equity security, bond or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Portfolio Management Risk

Securities held in your account will underperform other securities within the same asset class.

Equity and Equity-Related Instruments

Stocks and other equity-related instruments may be subject to various types of risk, including market risk, liquidity risk, counterparty credit risk, legal risk and operations risk. In addition, equity-related instruments can involve significant economic leverage and may, in some cases, involve significant risk of loss. "Equity securities" may include common stocks, preferred stocks, interests in real estate investment trusts, convertible debt obligations, convertible preferred stocks, equity interests in trusts, partnerships, joint ventures or limited liability companies and similar enterprises, warrants and stock purchase rights. Equity securities fluctuate in value, and such fluctuations can be pronounced. In general, stock values fluctuate in response to the activities of individual companies and in response to general market and economic conditions. Accordingly, the value of the stocks and other securities and instruments that a client holds may decline over short or extended periods.

Smaller Company Securities Risk

Securities of small or mid-capitalization companies ("smaller companies") can, in certain circumstances, have a higher potential for gains than securities of large-capitalization companies, but they also may have more risk. For example, smaller companies may be more vulnerable to market downturns and adverse business or economic events than larger, more established companies because they may have more limited financial resources and business operations. These companies are also more likely than larger companies to have more limited product lines and operating histories and to depend on smaller management teams. Their securities may trade less frequently and in smaller volumes and may be less liquid and fluctuate more sharply in value than securities of larger companies. In addition, some smaller companies may not be widely followed by the investment community, which can lower the demand for their stocks.

Non-Diversification Risk

This strategy invests in a limited number of investments. The investment portfolio of such accounts may be subject to higher volatility in value than would be the case if the account maintained a wider diversification among issuers.

Foreign Exposure Risk

There are risks and costs involved in investing in non-U.S. traded securities which are in addition to the usual risks inherent in securities that are traded on a U.S. exchange. These risks will vary from time to time and from country to country, especially if the country is considered an emerging market or developing country and may be different from or greater than the risks associated with investing in developed countries. These risks may include, but are not limited to, higher transaction costs, the imposition of additional foreign taxes, less market liquidity, security registration requirements and less comprehensive security settlement procedures and regulations, significant currency devaluation relative to the U.S. dollar, restrictions on the ability to repatriate investment income or capital, less government regulation and supervision, less

public information, less economic, political and social stability and adverse changes in diplomatic relations between the United States and that foreign country.

Indirect Foreign Exposure Risk

Investments in U.S.-traded securities that are organized under the laws of a foreign country or have significant business operations abroad may be impacted by certain foreign exposure risks described above indirectly

Stock Market Risk

There is a risk that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising prices and periods of falling prices.

Business Risk

Securities issued by certain types of companies or companies within certain industries are subject to greater risks of loss due to the nature of their business. For example, before they can generate a profit, oil-drilling companies depend on being able to find oil and then refine it, which is a lengthy process. They carry a higher risk of loss than an electric company for example, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.

Issuer Risk

The price of any security issued by a company may drop in reaction to events and conditions that impact the business of a particular company or its industry. For example, changes in key personnel, shifts in supply or demand for the company's product or its materials, or regulatory events may affect business operations, while other comparable issuers are unaffected.

Interest-rate Risk

Fluctuations in interest rates may cause prices of fixed income securities to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.

Credit (Default) Risk

The owner of a fixed income security may lose money if the issuer is unable or unwilling to make timely principal and/or interest payments or to otherwise honor its payment obligations. Further, when an issuer suffers adverse changes in its financial condition or credit rating, the price of its debt obligations may decline and/or experience greater volatility. These adverse changes can also affect the liquidity of an issuer's debt securities and make them more difficult to sell.

Extension Risk

An issuer may exercise its right to pay principal on an obligation held by a portfolio (such as a mortgage- or asset-backed security) later than expected. This may happen when there is a rise in interest rates. These events may lengthen the duration and potentially reduce the value of these securities.

Prepayment Risk

When the issuer of a fixed income security has the right to prepay principal, if it exercises that right earlier or at a higher rate than expected, an investor may incur losses from being unable to recoup the initial investment and/or from having to reinvest in lower-yielding securities. This can have an adverse effect on income, total return and/or price of the security. Prepayment risk tends to be highest in periods of declining interest rates. Asset-backed securities, including mortgage-backed and commercial mortgage-backed securities, are subject to greater prepayment risk than other types of fixed income securities.

Reinvestment Risk

This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (e.g., interest rate). This primarily relates to investments in fixed income securities, but also applies to investment in other income-generating securities, including shares of funds.

Liquidity Risk

Liquidity is the ability to readily convert an investment into cash. The less liquid an asset is, the greater the risk that, if circumstances require an investor to sell the asset quickly, it will be sold at a price below fair value. Generally, an asset is more liquid if it represents a standardized product or security and there are many traders interested in making a market in that product or security. For example, Treasury Bills are highly liquid, while real estate properties are not.

Inflation Risk

When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Financial Risk

Excessive borrowing to finance a business' operations increases the risk of profitability because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Investment in Foreign Securities

The clients may invest, directly or indirectly, in securities of non-U.S. issuers. Non-U.S. investments, and in particular those in emerging markets, involve certain special risks, including (1) political or economic instability; (2) the unpredictability of international trade patterns; (3) the possibility of non-U.S. governmental actions such as expropriation, nationalization or confiscatory taxation; (4) the imposition or modification of currency controls; (5) price volatility; (6) the imposition of withholding taxes on dividends, interest and gains; (7) different bankruptcy laws and practice; (8) the fluctuation of currency exchange rates; and (9) the lack of, or different, regulations applicable to such investments as compared to U.S. investments.

Emerging Markets Risk

The risks associated with foreign investments are heightened when investing in emerging markets. The governments and economies of emerging market countries may show greater instability than those of more developed countries. Such investments tend to fluctuate in price more widely and to be less liquid than other foreign investments.

Currency Risk

Securities issued in currencies other than the U.S. dollar are subject to fluctuations in value due to fluctuations in the value of the U.S. dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk. U.S. dollar-denominated securities of foreign issuers may also be subject to currency risk due to changes in exchange rates that impact the issuer's ability to transact business or make interest payments on debt obligations in U.S. dollars.

ETF and Mutual Fund Risk

ETFs and mutual funds are subject to investment advisory and other expenses, which will be indirectly paid by a client. As a result, the cost of investing by the client will be higher than the cost of investing directly in ETFs or mutual funds and may be higher than other mutual funds that invest directly in securities. ETFs and mutual funds are subject to specific risks, depending on the nature of the underlying fund.

U.S. Government Securities Risk

Although U.S. Government securities are considered among the safest investments, they are not guaranteed against price movements due to changing interest rates. Obligations issued by some U.S. Government agencies are backed by the U.S. Treasury, while others are backed solely by the ability of the agency to borrow from the U.S. Treasury or by the agency's own resources.

Global Market Risk

Global markets are interconnected, and events like hurricanes, floods, earthquakes, forest fires and similar natural disturbances, war, terrorism or threats of terrorism, civil disorder, public health crises (such as COVID-19), and similar "Act of God" events have led, and may in the future lead, to increased short-term market volatility and may have adverse long-term and wide-spread effects on world economies and markets generally. Clients may have exposure to countries and markets impacted by such events, which could result in material losses.

Pandemic Risk

The global spread of novel coronavirus disease (COVID-19) was declared a pandemic by the World Health Organization. This pandemic has resulted in significant disruptions to economies and markets, adversely impacting individual companies, sectors, industries, currencies, interest and inflation rates, credit ratings, and investor sentiment. COVID-19 has caused volatility, severe market dislocations and liquidity constraints in many markets, including markets for the securities the adviser holds, and may adversely affect the adviser's investments and operations. The duration and extent of COVID-19 over the long-term cannot be reasonably estimated at this time. There have been no comparable recent events that provide guidance as to the effect

the spread of COVID-19 as a global pandemic may have on the adviser's financial performance. In addition, COVID-19 and governmental responses to COVID-19 may negatively impact the capabilities of the adviser's service providers and disrupt the adviser's operations. This pandemic may result in substantial market volatility and may adversely impact the prices and liquidity of an adviser's investments.

Cybersecurity Risk

In connection with the increased use of technologies such as the Internet and the dependence on computer systems to perform necessary business functions, SBH may be susceptible to operational, information security and related risks due to the possibility of cyber-attacks or other incidents. Cyber incidents may result from deliberate attacks or unintentional events. Cyber-attacks include, but are not limited to, infection by computer viruses or other malicious software code, unauthorized access to systems, networks or devices that are used to service a Fund's operations through hacking or other means for the purpose of misappropriating assets or sensitive information, corrupting data or causing operational disruption. Cyber-attacks may also be carried out in a manner that does not require gaining unauthorized access, such as causing denial-of-service attacks (which can make a website unavailable) on the firm's website. In addition, authorized persons could inadvertently or intentionally release confidential or proprietary information stored on an adviser's systems.

Investors in certain SBH private funds are subject to the following additional risks:

Aggressive Investment Technique Risk

The manager of certain underlying funds may use investment techniques and financial instruments that may be considered aggressive, including but not limited to investments in derivatives such as futures contracts, options on futures contracts, securities and indices, forward contracts, swap agreements and similar instruments. Such techniques may also include taking short positions or using other techniques that are intended to provide inverse exposure to a particular market or other asset class, as well as leverage, which can expose an SBH private fund to potentially dramatic changes (losses or gains). These techniques may expose an SBH private fund to potentially dramatic changes (losses) in the value of certain of its portfolio holdings.

<u>Liquidity and Transferability of Underlying Fund Interests</u>

Certain underlying funds offer their investors only limited liquidity and interests are generally not freely transferable. In addition to other liquidity restrictions, the SBH's private funds generally offer only monthly or quarterly liquidity following prior notice for investors. Investments in underlying funds may offer liquidity at infrequent times (i.e., monthly, quarterly, annually or less frequently). Accordingly, investors in SBH's private funds should understand that they may not be able to liquidate their investment in the event of an emergency or for any other reason.

Limitations on Withdrawal of Capital

Certain SBH private funds and the underlying funds in which they invest have broad rights to defer, suspend, side pocket, or otherwise delay all or a portion of a withdrawal request, as well

as to delay payment of all or a portion of withdrawal proceeds. In periods of market disruption, when an SBH private fund may have the most need for the withdrawal proceeds, the private fund or an investor in such private fund may be unable to withdraw its capital. No assurances can be made that an SBH private fund will be able or willing to liquidate investments sufficient to satisfy all or any portion of withdrawal requests, and SBH private funds and investors therein must be prepared to bear the financial risks of an investment for an indefinite period of time materially increasing the risk of investment.

Possibility of Fraud and Other Misconduct

Certain SBH private funds invest in underlying funds. In these instances, the private fund does not have custody of the underlying fund's assets. Therefore, there is the risk that the underlying fund or its custodian could divert or abscond with those assets, fail to follow agreed upon investment strategies, provide false reports of operations, or engage in other misconduct. Moreover, there can be no assurances that all underlying funds will be operated in accordance with all applicable laws and that assets entrusted to underlying funds will be protected.

Counterparty Risk

The institutions (such as banks) and prime brokers with which a manager does business, or to which securities have been entrusted for custodial purposes, could encounter financial difficulties. This could impair the operational capabilities or the capital position of a manager or create unanticipated trading risks.

For investors in SBH private funds or the Funds, the summary above is qualified in its entirety by the risk factors set forth in the applicable offering materials for the applicable product.

Real Estate

Certain SBH private fund's investments will be subject to the risks inherent in the ownership and operation of real estate and real estate-related businesses and assets. Some risks that may be associated with the direct ownership of real property include: declines in the value of real estate, risks related to general and local economic conditions, overbuilding and increased competition, increase in property taxes and/or operating expenses, and variations in rental income.

ITEM 9 - DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SBH or the integrity of SBH's management. SBH has no material information responsive to this Item.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Other Financial Industry Activities or Affiliation

SBH is owned by CI U.S. Holdings, which is owned by CI Financial Corp., an independent company offering global asset management and wealth management advisory services based in Toronto, Canada.

CI Financial, through CI Private Wealth or other indirect subsidiaries, also owns other registered investment advisers, tax preparation service companies, and other financial services-related companies located in the U.S. and Canada (CI affiliates). Some CI Affiliates manage or advise private funds, investment companies or other investment vehicles as disclosed in their respective Form ADV's. To the extent that SBH clients are referred to other CI Affiliates, additional disclosures are provided below. Currently, SBH operates independently of other CI Affiliates.

In the past CI Affiliates have, and in the future, we expect CI Affiliates will, agree to transition existing clients between one another. When that occurs, the applicable CI Affiliates will disclose such activity to the applicable clients. In addition, from time to time we anticipate a CI Affiliate will refrain from pursuing a potential client in favor of another CI Affiliate. Regardless of whether SBH is involved in any of the forgoing activities, SBH will carry out its investment advisory activities, including the exercise of investment discretion and voting rights, independent of other CI Affiliates.

SBH is registered with the CFTC as a "commodity pool operator." The Firm is a member of the National Futures Association, which is the self-regulatory organization for the futures industry.

For both its US domiciled private funds and its non-US domiciled private funds, a wholly owned subsidiary of SBH typically serves as the managing member of such funds. For its non-U.S. domiciled SBH private funds, an employee of SBH generally holds a position on each non-U.S. SBH private fund's board of directors.

SBH has entered into investment advisory and/or co-administration agreements with Segall Bryant & Hamill Funds, within the Segall Bryant & Hamill Trust. Pursuant to these agreements, SBH provides investment advisory services and/or certain administrative, management and record keeping services for these funds. Individuals associated with the firm serve as officers of the Funds within the Segall Bryant & Hamill Trust. In addition, SBH employees may own securities held in one or more of these mutual funds, subject to the SBH Code of Ethics.

Certain employees of SBH are registered representatives with Foreside Fund Services, LLC ("Foreside"). As registered representatives, the employees are authorized to sell the SBH Funds and receive compensation in connection with such activities. SBH is not affiliated with Foreside. Such registered representatives have an incentive to sell SBH's products over other products where such registered representatives do not receive compensation.

ITEM 11 - CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

As required under Rule 204(A)-1 of the Investment Adviser's Act of 1940, SBH has adopted a Code of Ethics ("Code") for all supervised persons of the firm describing its standard of business conduct and fiduciary duty to its clients. The Code includes provisions relating to the confidentiality of client information, a prohibition on insider trading, guidance on certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at SBH must acknowledge and abide by the terms of the Code.

The Code is designed to seek assurance that the personal securities transactions, activities, and interests of the employees of SBH will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of SBH's clients. In addition, the Code requires preclearance of many transactions and restricts trading in close proximity to client-trading activity unless an exemption exists, such as a *de minimis* exemption. Nonetheless, because the Code in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is monitored under the Code to reasonably prevent conflicts of interest between SBH and its clients.

SBH or any related person(s), including investment professionals having direct responsibility for investment decisions, may have an interest or position in a certain security or group of securities which may also be recommended to a client. Such securities include publicly traded and privately placed stocks, bonds and options contracts. SBH also acts as an advisor and through a wholly owned subsidiary, a general partner in investment related partnerships, which it makes available to clients.

SBH's clients or prospective clients may request a copy of the firm's Code by contacting 312-474-1222 or contactus@sbhic.com.

SBH requires prompt reports on all transactions and holdings covered by the Code on a quarterly basis. SBH further requires that all brokerage account relationships be disclosed, that SBH receive duplicate confirmations of transactions and custodial account statements, and annual certifications of compliance with the Code from all covered persons.

In addition to reporting and record keeping requirements, the Code imposes various substantive and procedural restrictions on covered transactions, including the following:

1. All transactions in securities covered by the Code must be pre-cleared in accordance with the code. Transactions will be approved and executed only if there are no conflicting orders pending for the accounts of clients unless an exemption or exception applies.

- 2. Purchase of new equity issues on the initial underwriting by employees is prohibited.
- 3. The Code of Ethics includes certain de minimis exceptions based on market capitalization.

SBH buys, sells and performs research on or through companies for whom a client may be the company, an employee, officer or director.

SBH and/or its employees give charitable contributions to client organizations (this may be golf sponsorships or specific charity donations). Officers and/or employees are permitted to personally own securities of broker-dealers and/or custodians SBH does business with.

SBH invests in securities of which related persons of its employees are insiders. SBH's trading and research will not be based on inside information.

ITEM 12 - BROKERAGE PRACTICES

A. Brokerage Selection

Generally, SBH has authority to determine, without obtaining specific client consent, the securities to be bought or sold, the amount of the securities to be bought or sold, whether transactions should be combined (blocked) with similar trades for other accounts, the broker dealer to be used, and the commission rate to be paid. In some instances, however, limitations can be imposed by the client prior to any action being taken or specific instructions may be mandated.

The firm's general policies regarding selection of brokers and payment of commissions is to seek "best execution" with respect to all portfolio transactions. The Firm must execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances. This principle recognizes that commissions on portfolio transactions must be utilized for the ultimate benefit of the firm's clients. In selecting a broker for any transaction, SBH considers both qualitative and quantitative characteristics of each broker, including:

- Financial strength, stability and reputation
- Efficiency of execution and error resolution
- Block trading and block positioning capabilities
- Experience of traders
- Access to multiple trading algorithms
- Research relating to the particular transaction

SBH maintains and periodically updates a list of approved brokers and dealers which, in SBH's judgment, are generally capable of providing best execution and are in SBH's opinion financially stable. SBH's traders are directed to use only brokers and dealers on the approved list, except in case of client designations of brokers or dealers to effect transactions for such clients' accounts. All new brokerage relationships are approved by the firm's Chief Compliance Officer or Chief Executive Officer.

SBH's participation in the Schwab Advisor Network ("SAN") raises potential conflicts of interest. Although not required by SAN, advisers participating in the SAN are likely to execute transactions for their advisory clients referred through the SAN with Charles Schwab. In this circumstance, SBH acknowledges its duty of seeking best execution for its clients.

Research and Other Soft Dollar Benefits (including Commission Sharing Arrangements)

SBH may pay commission rates on equity transactions at commission rates that exceed those that a broker might charge for effecting the same transaction because of the value of the eligible brokerage and/or research products or services ("Research") that such broker or third party provides. This practice is allowable under Section 28(e) of the Securities and Exchange Act of 1934 if SBH determines, in good faith, that the commission paid is reasonable in relation to the value of the Research provided.

The source of the Research can be categorized as either "proprietary" or "third party." When the broker-dealer that executes a trade also provides SBH with internally generated research in exchange for one bundled per share commission price, that Research is referred to as "proprietary." "Third party" Research involves the executing broker providing independent Research generated by a third party in exchange for commission dollars. In these cases, SBH negotiates the execution cost with the executing broker.

SBH also has arrangements where it receives certain non-research products and services from unaffiliated third parties providing trading and custody services. These products and services include assistance in administering clients' accounts, providing pricing information and other market data and assistance with back-office functions, recordkeeping, and client reporting. This practice is allowable under Section 28(e) of the Securities and Exchange Act of 1934 if SBH determines, in good faith, that the commission paid is reasonable in relation to the value of the Research provided.

The Research obtained normally benefits many accounts rather than just the one(s) for which the order is being executed, and in some cases is not used in connection with the account which actually paid the commissions to the broker providing the Research. SBH does receive a benefit because the firm does not have to produce or pay for the Research. There is an inherent conflict of interest in these arrangements where an incentive exists for SBH to select a broker-dealer based on the firm's interest in receiving the Research, rather than on a client's interest in receiving most favorable execution.

SBH has addressed these conflicts of interest by periodically evaluating:

- The commission rates paid by clients against industry benchmarks given the size and nature of the firm's trading
- The value of the Research obtained to the firm's investment processes
- Monitoring trade execution

The following products and services acquired by SBH through Research arrangements in 2020 were as follows:

- Research services and reports
- Economic and market information
- Technical data
- Research conferences
- Consultations
- Benchmark index data
- Company specific data
- Trade order management software
- Quotation services

On at least a quarterly basis, an Equity Best Execution committee consisting of SBH's portfolio managers, operations and trading personnel, research analysts, compliance and CIO reviews the quality of research and execution services of the various broker-dealers and independent research firms. The committee, in conjunction with the Research Budget Group ("RBG"), also evaluates the commission rates negotiated with the various brokers to make a good faith determination that they are reasonable in relation to the value of products and services provided.

Client-Directed Brokerage Arrangements

Clients can direct SBH in writing (subject to certain conditions which may from time to time be imposed by SBH) to effect portfolio transactions for their accounts through specified brokers or dealers. Such a direction may be conditioned upon the broker or dealer being competitive as to net price and execution of each transaction or may be subject to varying degrees of "restriction," i.e., an instruction to use the particular broker or dealer whether or not competitive as to net price and execution, or at specified commission rates which are less favorable than otherwise might be obtainable by SBH.

In the case of a "restricted" designation, SBH generally will execute transactions in listed and over-the-counter equity securities through the designated broker, but in the case of transactions in fixed income securities: (a) SBH sometimes deviates from the client's designation in situations in which, in SBH's judgment, a significantly more advantageous net price is available from another dealer; or (b) SBH may authorize the designated broker-dealer to effect the transaction as agent in order to obtain a better price from another dealer, but will allow the designated "agent" broker-dealer a scheduled mark-up or mark-down on the transaction.

Clients sometimes wish to restrict brokerage to a particular broker or dealer in recognition of custodial or other services (including, in some cases, referral of the client to SBH for investment advisory services) provided to the client by the broker or dealer. A client which chooses to designate use of a particular broker or dealer completely or on a "restricted" basis, including a client which designates a broker or dealer as custodian of the client's assets, should consider whether such a designation may result in certain costs or disadvantages described below regarding priority of execution, allocation of new issue purchases and aggregation of orders. In determining whether to instruct SBH to use a particular broker or dealer on a "restricted" basis,

the client may wish to compare the possible costs or disadvantages of such an arrangement with the value of the custodial or other services provided.

Clients who restrict brokerage for their accounts may be disadvantaged in obtaining allocations of securities which SBH purchases or recommends for purchase in other clients' accounts. It is SBH's policy that such "restricted" accounts not participate in allocations of securities obtained through brokers and dealers other than that designated by the client.

In order to execute client orders most efficiently, SBH's traders may assign a lower priority to execution of orders for client accounts which have restricted brokerage. Accordingly, the execution of orders for accounts which restrict brokerage may be less timely than the execution of orders for other client accounts. This priority of execution may or may not result in any consistent price disadvantage, depending upon the market activity in the security to be purchased or sold.

Trading for wrap programs is typically executed by the program sponsor. Wrap sponsors charge a combined fee to clients which includes execution services and trading away from such sponsors causes clients to incur additional execution charges. SBH follows its trade aggregation and allocation policies with respect to wrap program trading, however in certain circumstances following contractual arrangements, wrap program trades may be executed after "unrestricted" and "restricted" trades are executed. Where SBH determines to seek to obtain best execution away from such wrap sponsor, such trades will generally be executed with other non-restricted and unrestricted trades.

For those strategies that have SMA Wrap / UMA Model platforms, a random trade rotation is assigned across the three types of relationships: Institutional/SMA Wrap (discretionary) and Model (non-discretionary) platforms. SMA Wrap trades are directed to the wrap trading desk for each wrap sponsor. The model platforms are assigned a sub-rotation and trades are communicated to the model sponsor via the sponsor's established processes and requirements.

Recommendation of Brokers and Dealers to Clients

Where a client is reluctant to incur the fee cost of using the services of a bank or trust company as custodian of the client's assets, SBH will suggest the client use a broker for this purpose and, if the client does not already have a satisfactory brokerage arrangement, SBH will suggest the names of one or more brokers with which it is familiar, and which provide such services. Factors considered by SBH in selecting brokers which it recommends to clients for custodial services include: the execution, clearance and settlement capabilities of the broker; SBH's knowledge of the financial stability of the broker; whether the broker offers insurance coverage to customers in excess of the Securities Investor Protection Corporation insurance amounts; SBH's knowledge of actual or apparent operational problems of the broker; and the willingness of the broker to negotiate discounted commission rates for the execution of transactions in the custodial amount. The value of research products and services, or other products, if any, provided to SBH or a related party by the broker is generally not a factor.

Brokerage Practices, General

SBH receives a benefit when it uses client commissions to receive research, because SBH does not have to pay for such services on its own. SBH has an incentive to select or recommend a broker-dealer based on its interest in receiving research from a broker-dealer or third party, rather than the client's interest in seeking favorable execution. However, as described above, SBH trading practices are designed to achieve best execution for its clients even where it is receiving research services from broker-dealers.

B. Trade Aggregation and Allocation

SBH may place purchase or sale orders for a single security with a broker-dealer for an aggregate group of substantially similar clients when determined that it is consistent with the best interest of clients to do so. In instances where the purchase or sale order for a single security cannot be aggregated across all clients, the firm maintains aggregation policies and procedures to ensure the order of execution is fair and equitable over time among all clients that granted SBH discretionary authority.

To the extent that an aggregated order is filled at different prices during a trading day, each participating account will receive the same average price and pay the same average commission for the transaction. Should an aggregated order be partially completed during a trading day, securities will be allocated pro rata based upon each participating account's percentage of the entire order. If the pro rata allocation would result in numerous accounts receiving small positions, SBH has fair and equitable procedures in place to allocate such "partial fills" to accounts. Generally, fixed income securities will be aggregated and allocated in a fair and equitable manner taking into account that such securities may be available in limited quantities that preclude pro-rata allocation and the fact that other fixed income securities of equal quality and yield may be suitable substitutes.

Certain affiliated accounts trade in the same securities with client accounts on an aggregated basis when consistent with SBH's obligation of best execution. In such circumstances, trading would always be executed in a manner which ensures client's interest receive priority.

From time to time, SBH may advise clients who wish to purchase and sell the same security. In such circumstances, SBH may utilize the services of a single, independent third-party broker-dealer to affect the transaction. While a potential conflict of interest exists with respect to SBH's role in providing investment advice to clients on both sides of a transaction, SBH will seek to minimize such potential conflicts by permitting such trades only with independent third-party broker-dealers, only after concluding the trade is in the best interests of each client and only if consistent with seeking best execution. SBH utilizes third-party pricing services in valuing securities.

Except as described above, it is SBH's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal

transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. SBH does not engage in agency cross transactions but may engage in certain non-agency Fixed Income cross transactions (utilizing an independent third-party brokerage firm) for non-ERISA clients, provided the transaction is in the best interests and appropriate for both clients, the transaction is consistent with SBH's obligations to seek best execution and an independent or objective pricing mechanism is utilized.

SBH engages in "step-out" brokerage transactions subject to best price and execution. In a "step-out" trade, one broker-dealer executes the transaction, while a second broker-dealer clears and settles the transaction. The first broker-dealer then shares part or all of its commission with respect to the transaction with the second broker-dealer. SBH engages in step-out transactions primarily (1) to satisfy directed brokerage arrangements of certain of its client accounts and/or (2) to pay commissions to broker-dealers that supply research or analytical services to the Adviser. Shares traded via step-out are traded on a pre-determined cost per share, that is netted up into the trade regardless of account type. The cost varies by broker.

SBH may from time-to-time purchase securities which are part of an initial public offering ("IPO"). Generally, SBH's participation in the initial public offering market is not material, and as a result, SBH may not obtain sufficient shares in an initial public offering to allocate to all eligible accounts on a pro rata basis except as a de minimis allocation. In such instances, the Firm will use another objective method of allocation, which may include a random allocation.

ITEM 13 - REVIEW OF ACCOUNTS

Individually managed and institutional accounts are reviewed on a continual basis by the portfolio manager and their respective teams. There is no specific sequence in which accounts are reviewed. Rather, an ongoing review process is in place. Additional reviews are initiated when market conditions dictate, client circumstances warrant, or any other pertinent factors surface. Thus, the frequency of reviews may vary. Reviews are undertaken in context with applicant's current investment policy guidelines, individual security analysis and/or client investment considerations. Institutional accounts frequently utilize a consulting firm which the firm's professionals work closely with in servicing the account. The level of review on individual accounts within a third-party wrap program, where SBH serves as a portfolio manager, is typically limited subject to the agreement with the wrap program sponsor.

Reporting is customized based on the needs of each client. Clients and/or client representatives typically receive written or electronic information via a client portal on performance, portfolio appraisal, transaction history and portfolio characteristics on a daily, monthly or quarterly basis. The firm relies on the sponsor of the wrap programs for any wrap program client reporting.

See Custody section for information on frequency of client reports.

ITEM 14 - CLIENT REFERRALS AND OTHER COMPENSATION

Additional Compensation

SBH from time to time may compensate, either directly or indirectly, any person for client referrals. SBH is aware of the requirements under Section 206(4)-3 of the Investment Advisors Act of 1940 and endeavors to comply therewith. SBH maintains written agreements and client acknowledgements for each relationship.

In addition, SBH receives client referrals from Charles Schwab & Co., Inc. ("Schwab") through SBH's participation in Schwab Advisor Network ("SAN"). SAN is designed to help investors find an independent investment advisor. Schwab is a broker-dealer independent of and unaffiliated with SBH. Schwab does not supervise SBH and has no responsibility for SBH's management of clients' portfolios or SBH's other advice or services. SBH pays Schwab fees to receive client referrals through SAN. SBH's participation in SAN raises potential conflicts of interest described below.

SBH pays Schwab Participation Fees on all referred clients' accounts that are maintained in custody at Schwab and a Non-Schwab Custody Fee on all accounts that are maintained at, or transferred to, another custodian.

Participation Fees are a percentage of the value of the assets in the client's account. SBH pays Schwab Participation Fees for so long as the referred client's account remains in custody at Schwab. Participation Fees are billed to SBH quarterly and may be increased, decreased or waived by Schwab from time to time. Participation Fees are paid by SBH and not by the client. SBH does not charge clients referred through SAN fees or costs greater than the fees or costs SBH charges clients with similar portfolios who were not referred through the SAN.

SBH generally pays Schwab a Non-Schwab Custody Fee if custody of a referred client's account is not maintained by, or assets in the account are transferred from, Schwab. The Non-Schwab Custody Fee is a one-time payment equal to a percentage of the assets placed with a custodian other than Schwab. The Non-Schwab Custody Fee is higher than the Participation Fees Advisor generally would pay in a single year. Thus, SBH will have an incentive to recommend that client accounts be held in custody at Schwab.

The Participation and Non-Schwab Custody Fees are based on the amount of assets in accounts of SBH's clients who were referred by Schwab and those referred clients' family members living in the same household. Thus, SBH will have incentives to encourage household members of clients referred through the Service to maintain custody of their accounts at Schwab.

For accounts of SBH's clients maintained in custody at Schwab, Schwab generally does not charge the client separately for custody but receives compensation from the client in the form of commissions or other transaction-related compensation on securities trades Schwab

executes for the client's account. Clients also pay Schwab a fee for clearance and settlement of trades executed through broker-dealers other than dealer's fees. Thus, SBH may have incentive to cause trades to be executed through Schwab rather than another broker-dealer. SBH nevertheless acknowledges its duty to seek best execution of trades for client accounts. Trades for client accounts held in custody at Schwab may be executed through a different broker-dealer than trades for SBH's other clients. Thus, trades for accounts held in custody at Schwab may be executed at different times and different prices than trades for other accounts that are executed at other broker-dealers.

SBH may participate in other referral programs from time to time through agreements similar to those described above with the sponsors of such other programs. Such agreements, if any, are available for inspection upon request by any client.

Some of SBH's supervised persons may accept incentive compensation for the sale of SBH's advisory products. SBH's supervised persons do not recommend non-SBH investment products or services. Certain of these supervised persons may be dually registered with a broker-dealer. To the extent that SBH's supervised persons' recommendation of SBH's products or services constitutes a conflict of interest, SBH addresses this conflict through disclosure in this brochure.

ITEM 15 - CUSTODY

All client certificated assets are held by a qualified custodian. Accordingly, clients should be receiving at least quarterly statements from a qualified custodian. Other than for the SBH Funds and SBH private funds, SBH prepares and delivers to all clients, either hard copies or electronically via a secured client portal, valuations of their accounts at least quarterly, showing cash and all currently held investments categorized by maturity (fixed income investments) or industry (equity investments), market value and unit cost. A summary of transactions for the prior quarter accompanies the inventory. Clients may request more frequent or detailed reports in accordance with their individual needs. SBH has a reasonable belief that the custodian is sending statements in accordance with SEC's Custody Rule. Reports or statements produced by the Firm are provided to clients. The client should compare the information provided by SBH with the statements provided by the custodian.

Investors in the SBH private funds receive written valuations of their account balances monthly from the fund administrator. In its capacity as manager to certain private funds, SBH is deemed to have custody of such fund's assets. SBH maintains the private funds' cash and securities with a qualified custodian and provides investors in such private funds with an annual audited financial statement within 180 days of the end of such private fund's fiscal year.

For certain wealth management clients, where SBH's portfolio managers act as trustees, SBH is deemed to have custody of client assets. In such situations, SBH has an independent accountant conduct an annual surprise examination. The accounting firm that conducts the surprise exam also serves as the independent external auditor for SBH and for the private funds.

Pursuant to recent SEC guidance on the Custody Rule, SBH is deemed to have custody of client assets for clients who have Standing Letters of Authorization ("SLOA") arrangements in place with their custodian allowing SBH to direct transfers of client assets to a third party at the client's request. In these situations, the SEC has provided advisors with certain conditions that, if met, would allow advisors to forego the annual surprise exam requirement of the Custody Rule. SBH will document compliance with these conditions.

ITEM 16 – INVESTMENT DISCRETION

Clients may choose to retain SBH as investment adviser with or without granting investment discretion. Where a client chooses to grant investment discretion to SBH, SBH will have authority to supervise and direct the investments of and for the client's account without prior consultation with the client. Pursuant to this discretionary authority, SBH normally will determine which securities are bought or sold for the account, the total amount of such purchases and sales, the brokers or dealers through which transactions will be affected, and the commission rates, if any, paid to affect the transactions. SBH's authority may be made subject to conditions imposed in writing by the client, e.g., where the client restricts or prohibits purchases of certain types of securities, or directs that transactions be affected through specific brokers or dealers.

While SBH does not typically accept non-discretionary assignments, in those cases where a client does not choose to grant to SBH investment discretion, SBH makes investment recommendations to the client as to which securities are to be purchased or sold, and the amounts to be purchased or sold. Upon approving the recommended transactions, the client may request that SBH direct the execution of purchase or sale orders to implement the recommended transactions for the client's account. SBH then may be given authority to determine the brokers or dealers through which the transactions will be executed, and the commission rates, if any, paid to affect the transactions. As described above with respect to discretionary accounts, the client may direct that transactions be affected with specific brokers or dealers.

SBH usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and number of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, SBH observes the investment policies, limitations, and restrictions of the clients for which it advises.

SBH seeks to obtain investment guidelines and restrictions in writing prior to the commencement of management.

ITEM 17 - VOTING CLIENT SECURITIES

I. POLICY

SBH acts as a discretionary investment adviser for various clients, which includes clients governed by the Employee Retirement Income Security Act of 1974 ("ERISA") and registered open-end investment companies ("mutual funds"). When entering into an investment management agreement with a client, it is the general policy of SBH to not vote proxies unless the client opts into the service provided by SBH. In specific provisions of SBH's investment management agreement, clients retain responsibility for voting proxies or responding to other corporate actions. Accounts governed by ERISA (certain pension or retirement plans, non-IRA's) are treated differently based on Department of Labor guidelines. Unless an ERISA client specifically reserves the right, in writing, to vote its own proxies or to take shareholder action with respect to other corporate actions requiring shareholder actions, SBH will vote all proxies and act on all other actions in a timely manner as part of its full discretionary authority over ERISA client assets in accordance with Proxy Voting Policy. Corporate actions may include, for example and without limitation, tender offers or exchanges, bankruptcy proceedings, and class actions (handled by a third party). In some cases, corporate actions may not be addressed by SBH, but rather by the client's custodian.

When voting proxies or acting with respect to corporate actions for clients, SBH's intent is that all decisions be made solely in the best interest of the client (and for ERISA accounts, plan beneficiaries and participants, in accordance with the letter and spirit of ERISA). SBH will seek to act in a prudent and diligent manner intended to enhance the economic value of the assets of the client's account.

II. PROCEDURES

SBH uses an outside service provider, Institutional Shareholder Services ("ISS"), to vote proxies.

As a general rule, the operations group will provide instructions to the custodian to forward all proxies to ISS. ISS receives all proxies and votes them in a timely manner and in a manner consistent with the determination of the client's best interests. Although many proxy proposals can be voted in accordance with ISS' established guidelines (see Section IV. below, "Guidelines"), it is recognized that some proposals require special consideration which may dictate that ISS and/or SBH makes an exception to the Guidelines. ISS is also responsible for ensuring that all corporate action notices or requests which require shareholder action received are addressed in a timely manner and consistent action is taken across all similarly situated client accounts.

A. Conflicts of Interest

Where a proxy proposal raises a material conflict between ISS and/or SBH's interests and a client's interest, including a mutual fund client, SBH will resolve such a conflict in the manner described below:

- 1. <u>Vote in Accordance with the Guidelines</u>. To the extent that SBH has little or no discretion to deviate from the Guidelines with respect to the proposal in question, SBH shall vote in accordance with such pre-determined voting policy as established by ISS.
- 2. Deviations to the ISS Policy. To the extent that SBH has discretion to deviate from the Guidelines with respect to the proposal in question, if a portfolio manager or analyst believes the ISS recommendation would be detrimental to the client's best interests, they may override the ISS vote with prior approval from the Chief Compliance Officer or the Chief Executive Officer. The operations group will maintain a written record supporting the decision to override the ISS recommendation.

ISS will review the proxy proposal for conflicts of interest as part of the overall vote review process. All material conflict of interest so identified by ISS and/or SBH will be addressed as described above in this Section II.A.

B. Limitations

As described above, in accordance with a client's investment advisory contract (or other written directive) or where SBH has determined that it is in the client's best interest, ISS and/or SBH will not vote proxies received. The following are certain circumstances where ISS and/or SBH will limit its role in voting proxies:

- 1. <u>Client Maintains Proxy Voting Authority</u>: As is ordinarily the case, where a client specifies in writing that it will maintain the authority to vote proxies itself or that it has delegated the right to vote proxies to a third party, ISS and/or SBH will not vote the securities and will direct the relevant custodian to send the proxy material directly to the client. If any proxy material is received by SBH, it will promptly be forwarded to the client or specified third party.
- 2. <u>Terminated Account</u>: Once a client account has been terminated with SBH in accordance with its investment advisory agreement, ISS and/or SBH will not vote any proxies received after the termination. However, the client may specify in writing that proxies should be directed to the client (or a specified third party) for action.
- 3. <u>Limited Value</u>: If ISS and/or SBH determines that the value of a client's economic interest or the value of the portfolio holding is indeterminable or insignificant, ISS and/or SBH may abstain from voting a client's proxies. ISS and/or SBH also will not vote proxies received for securities which are no longer held by the client's account.

- 4. <u>Securities Lending Programs</u>: When securities are out on loan, they are transferred into the borrower's name and are voted by the borrower, in its discretion. However, where SBH determines that a proxy vote (or other shareholder action) is materially important to the client's account, SBH may recall the security for purposes of voting.
- 5. <u>Unjustifiable Costs</u>: In certain circumstances, after doing a cost-benefit analysis, SBH may abstain from voting where the cost of voting a client's proxy would exceed any anticipated benefits to the client of the proxy proposal.

III. RECORD KEEPING

In accordance with Rule 204-2 under the Advisers Act, SBH will seek to maintain for the time periods set forth in the Rule (i) these proxy voting procedures and policies, and all amendments thereto; (ii) a record of all proxy statements received by ISS and/or SBH regarding client securities (provided however, that SBH may rely on the proxy statement filed on EDGAR as its records); (iii) a record of all votes cast on behalf of clients; (iv) records of all client requests for proxy voting information; (v) any material documents prepared by SBH were material to making a decision how to vote or that memorialized the basis for the decision; and (vi) all records relating to requests made to clients regarding conflicts of interest in voting the proxy. Currently, the requirement is six years, two of which shall be onsite.

Clients may obtain information on how proxies were voted with respect to the clients' portfolio securities or a copy of our Proxy Voting Policy by writing to SBH at 540 West Madison St., Suite 1900, Chicago, IL 60661 or by emailing contactus@sbhic.com.

IV. GUIDELINES

ISS will seek to consider each proxy issue individually. Proxy voting may be different for different types of clients. ISS issues proxy voting guidelines which are used as guidelines but will not be used as rigid rules. These guidelines are available upon request.

ITEM 18 - FINANCIAL INFORMATION

Not applicable.

ITEM 19 - REQUIREMENTS FOR STATE REGISTERED ADVISERS

Not applicable.

OUR CLIENT PRIVACY PLEDGE

At Segall Bryant & Hamill, our clients' trust is important to us. Because you trust us with your financial and other personal information, we take the safeguarding and respect of this information very seriously. To maintain that trust, we pledge to protect your privacy by striving to adhere to the policy outlined below.

Personal information we obtain is limited but may come to us through account opening documents and custodial statements. The type of information collected is personal financial information, transaction and various other similar items of personal information. This information is important to our providing the best services to you.

Also, we provide such client information to other third-party service providers when it is essential for the servicing of your account (i.e., transactional services). We may disclose such information to other third parties that we believe it necessary for the conduct of our business or where disclosure is required by law. We will subject such disclosures to confidentiality agreements.

It is our policy that we do not provide current and former customer names and account information to any outside firms, persons or organizations (such as catalogue or direct mail companies) unless there is a pre-existing relationship you have established such as a custodian or professional service provider (i.e., attorney, accountant), you have provided authority for us to do so or in situations where we have a legal or regulatory obligation to provide such information.

It is our policy to not provide any other businesses with any information specific to accounts maintained at Segall Bryant & Hamill for the purpose of marketing or business leads.

It is our policy regarding documentation containing sensitive client information (i.e., name, address, social security number, account number, credit information, etc.) to dispose of in a manner whereby the information cannot be read or reconstructed. This includes shredding the information on a timely basis.

It is our policy to remove all data from computers so that the information cannot be restored or reconstructed before the computer is donated or disposed.

Your information is protected in various manners. All employees are subject to a policy regarding confidentiality. Employees who violate our privacy policy are subject to disciplinary process. In addition, our internal systems are secured through encryption technology, passwords and physical safeguards. We strive to maintain the confidentiality of your account and any other personal information.



SEGALL BRYANT & HAMILL, LLC

540 West Madison St, Suite 1900 Chicago, IL 60661 (800) 836-4265 www.sbhic.com

Form ADV Part 2B Brochure Supplement

March 29, 2022

Mitch S. Begun C. Alfred Bryant Amy A. Cramer Alexander I. Crevi Alvin Cruz Victoria K. Cunningham James D. Dadura Scott E. Decatur Mark T. Dickherber Nicholas C. Fedako John C. Fenley Brian C. Fitzsimons Tina R.W. Fitzwater Nicholas J. Foley Sylvia G. Fulk J. Christopher Harrington Kenneth A. Harris Darren G. Hewitson

Gregory C. Hosbein

Troy A. Johnson John M. Lafferty, Jr. Chad A. McDonnell Thomas P. McGrath Keith M. Minogue Scott H. Newhall Shaun P. Nicholson Meghan S. O'Donnell Jeffrey C. Paulis Alan B. Polansky Suresh Rajagopal Timothy R. Rich Glenn R. Rippey John N. Roberts Jeffrey R. Rode Ralph M. Segall Gregory M. Shea Jeffrey L. Slepian M. Jay Trees

This Brochure Supplement provides information on our personnel listed above and supplements the Segall Bryant & Hamill Brochure. You should have received a copy of that Brochure.

Additionally, a <u>Summary of Professional Designations</u> is included with this Part 2B Brochure Supplement. This summary is provided to assist you in understanding the professional designations currently held by investment professionals.

If you have not received our firm's Brochure, have any questions about professional designations or about any content of this supplement, please contact us at 312-474-1222 or 800-836-4265 and/or contactus@sbhic.com.

Additional information about our personnel is available on the SEC's website at www.adviserinfo.sec.gov.

Mitch S. Begun

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1978

Designations: CFA (Chartered Financial Analyst)

Education: University of North Carolina at Chapel Hill – B.S.B.A., Business

Administration

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

02/03 to 05/18 Denver Investments

Partner, Portfolio Manager, Analyst

Disciplinary Information

Mitch Begun has no disciplinary disclosures to be reported.

Other Business Activities

Mitch Begun is not involved with any other material investment-related business.

Additional Compensation

Mitch Begun receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Brian C. Fitzsimons, Director of Small Cap Growth Strategies, (303) 312-5000. Mr. Fitzsimons monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

C. Alfred (AI) Bryant

Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4112

Educational Background and Business Experience

Year of Birth: 1945

Designations: CIC (Chartered Investment Counselor)

Education: Knox College – B.A., Economics

Indiana University – M.B.A., Finance

Business Background (preceding 5 years):

10/94 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

Disciplinary Information

C. Alfred Bryant has no disciplinary disclosures to be reported.

Business Activities

C. Alfred Bryant is not involved with any other material investment-related business.

Additional Compensation

C. Alfred Bryant receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Amy A. Cramer

Associate Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-6729

Educational Background and Business Experience

Year of Birth: 1973

Designations: None

Education: University of Wisconsin Madison – B.A., Sociology

University of Chicago – M.B.A., Marketing / Statistics

Business Background (preceding 5 years):

04/16 to Present Segall Bryant & Hamill, LLC

Associate Portfolio Manager

01/14 - 04/16 Merrill Lynch

Private Wealth Associate

Disciplinary Information

Amy Cramer has no disciplinary disclosures to be reported.

Business Activities

Amy Cramer is not involved with any other material investment-related business.

Additional Compensation

Amy Cramer receives compensation for providing advisory services solely from her responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Jeffrey L. Slepian, Senior Portfolio Manager, (312) 474-4120. Mr. Slepian monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

Alexander I. Crevi

Portfolio Manager 1415 Panther Lane, Suite 142 Naples, FL 34109 (312) 474-4254

Educational Background and Business Experience

Year of Birth: 1982

Designations: None

Education: Boston University – BS, Business Administration and Finance

Business Background (preceding 5 years):

07/21 to Present Segall Bryant & Hamill, LLC

Portfolio Manager

10/06 to 07/21 Rothschild Investment Corporation

Vice President

Disciplinary Information

Alexander Crevi has no disciplinary disclosures to be reported.

Business Activities

Alexander Crevi is not involved with any other material investment-related business.

Additional Compensation

Alexander Crevi receives compensation for providing advisory services solely from her responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Jeffrey L. Slepian, Senior Portfolio Manager, (312) 474-4120. Mr. Slepian monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

Alvin Cruz

Paraplanner Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1991

Designations: None

Education: University of South Florida – B.S., Personal Finance

Business Background (preceding 5 years):

01/20 to Present Segall Bryant & Hamill, LLC

Paraplanner

11/18 - 08/19 Merrill Lynch

Intern

09/10 – 09/14 Marine Corps

Disciplinary Information

Alvin Cruz has no disciplinary disclosures to be reported.

Business Activities

Alvin Cruz is not involved with any other material investment-related business.

Additional Compensation

Alvin Cruz receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Tina R.W. Fitzwater, Manager, Financial Planning, (312) 474-4216. Ms. Fitzwater monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

Victoria K. Cunningham

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1964

Designations: None

Education: Colorado College – B.A., Political Science and Government

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

06/00 to 05/18 Denver Investments

Partner, Portfolio Manager

Disciplinary Information

Victoria Cunningham has no disciplinary disclosures to be reported.

Other Business Activities

Victoria Cunningham is not involved with any other material investment-related business.

Additional Compensation

Victoria Cunningham receives compensation for providing advisory services solely from her responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

James D. Dadura

Director of Fixed Income 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4123

Educational Background and Business Experience

Year of Birth: 1968

Designations: CFA (Chartered Financial Analyst)

Education: University of Texas – B.B.A., Finance

DePaul University – M.B.A., Finance

Business Background (preceding 5 years):

09/99 to Present Segall Bryant & Hamill, LLC

Fixed Income Portfolio Manager

Disciplinary Information

James Dadura has no disciplinary disclosures to be reported.

Other Business Activities

James Dadura is not involved with any other material investment-related business.

Additional Compensation

James Dadura receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Scott E. Decatur

Director of Quantitative International Strategies 32 Parking Plaza, Suite 700 Ardmore, PA 19003 (610) 537-9965

Educational Background and Business Experience

Year of Birth: 1966

Designations: None

Education: Massachusetts Institute of Technology – B.S., Electrical Engineering and

Computer Science

Massachusetts Institute of Technology – M.S., Electrical Engineering and

Computer Science

Harvard University – Ph.D., Computer Science

Business Background (preceding 5 years):

06/15 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

06/04 to 06/15 Philadelphia International Advisors, LP

Chief Investment Officer, Portfolio Manager, Director of Quantitative

Research

Disciplinary Information

Scott Decatur has no disciplinary disclosures to be reported.

Other Business Activities

Scott Decatur is not involved with any other material investment-related business.

Additional Compensation

Scott Decatur receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

<u>Supervision</u>

Mark T. Dickherber

Director of Small Cap Strategies 14755 North Outer Forty, Suite 208 Chesterfield, MO 63017 (636) 681-1188

Educational Background and Business Experience

Year of Birth: 1975

Designations: CFA (Chartered Financial Analyst)

CPA (Certified Public Accountant)

Education: University of MO – St. Louis - B.S., Accounting

Business Background (preceding 5 years):

04/07 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

Disciplinary Information

Mark Dickherber has no disciplinary disclosures to report.

Other Business Activities

Mark Dickherber is not involved with any other material investment-related business.

Additional Compensation

Mark Dickherber receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Nicholas C. Fedako

Senior Portfolio Manager 32 Parking Plaza, Suite 700 Ardmore, PA 19003 (610) 537-9966

Educational Background and Business Experience

Year of Birth: 1974

Designations: CFA (Chartered Financial Analyst)

Education: Penn State University – B.S., in Finance and International Business

Business Background (preceding 5 years):

06/15 to Present Segall Bryant & Hamill, LLC

Portfolio Manager

01/02 to 06/15 Philadelphia International Advisors, LP

Quantitative Research Analyst

Disciplinary Information

Nicholas Fedako has no disciplinary disclosures to be reported.

Other Business Activities

Nicholas Fedako is not involved with any other material investment-related business.

Additional Compensation

Nicholas Fedako receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Scott Decatur, Senior Portfolio Manager (610) 537-9965. Mr. Decatur monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

John C. Fenley

Director of Fundamental International Strategies
Republic Plaza
370 17th Street, Suite 5000
Denver, CO 80202
(303) 312-5000

Educational Background and Business Experience

Year of Birth: 1968

Designations: CFA (Chartered Financial Analyst)

Education: Vanderbilt University, B.A., Economics

Duke University, M.B.A.

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Director of Fundamental International Strategies

09/00 to 05/18 Denver Investments

Partner, Director of International Portfolio Management, Portfolio

Manager, Analyst

Disciplinary Information

John Fenley has no disciplinary disclosures to be reported.

Other Business Activities

John Fenley is not involved with any other material investment-related business.

Additional Compensation

John Fenley receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Brian C. Fitzsimons

Director of Small Cap Growth Strategies Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1976

Designations: CFA (Chartered Financial Analyst)

Education: Metropolitan State University of Denver – B.S., Accounting

University of Denver – M.B.A.

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Director of Small Cap Growth Strategies

01/05 to 05/18 Denver Investments

Partner, Director of Small-Cap Growth Research, Portfolio Manager,

Analyst

Disciplinary Information

Brian Fitzsimons has no disciplinary disclosures to be reported.

Other Business Activities

Brian Fitzsimons is not involved with any other material investment-related business.

Additional Compensation

Brian Fitzsimons receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Tina R.W. Fitzwater

Manager, Financial Planning 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4216

Educational Background and Business Experience

Year of Birth: 1973

Designations: CFP® (Certified Financial Planner)

Education: University of Illinois, B.S.

DePaul University, M.S.

Business Background (preceding 5 years):

01/20 to Present Segall Bryant & Hamill, LLC

Manager, Financial Planning

10/15 to 12/19 Segall Bryant & Hamill, LLC

Client Service Administrator

07/99 to 09/15 Trees Investment Counsel

Vice President of Administration

Disciplinary Information

Tina Fitzwater has no disciplinary disclosures to be reported.

Other Business Activities

Tina Fitzwater is not involved with any other material investment-related business.

Additional Compensation

Tina Fitzwater receives compensation for providing advisory services solely from her responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Chad A. McDonnell, Senior Portfolio Manager, (303) 312-5060. Mr. McDonnell monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

Nicholas J. Foley

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1984

Designations: None

Education: Gonzaga University – B.S., Finance

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

10/12 to 05/18 Denver Investments

Vice President, Portfolio Manager, Municipal Credit Analyst/Trader

Disciplinary Information

Nicholas Foley has no disciplinary disclosures to be reported.

Other Business Activities

Nicholas Foley is not involved with any other material investment-related business.

Additional Compensation

Nicholas Foley receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Sylvia G. Fulk

Associate Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4135

Educational Background and Business Experience

Year of Birth: 1962

Designations: None

Education: Loyola University – B.S., Computer Science

DePaul University – M.B.A., Finance

Business Background (preceding 5 years):

12/15 to Present Segall Bryant & Hamill, LLC

Associate Portfolio Manager, Client Service Administrator

Disciplinary Information

Sylvia Fulk has no disciplinary disclosures to be reported.

Other Business Activities

Sylvia Fulk is not involved with any other material investment-related business.

Additional Compensation

Sylvia Fulk receives compensation for providing advisory services solely from her responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to C. Alfred (Al) Bryant, Senior Portfolio Manager, (312) 474-4112. Mr. Bryant monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

J. Christopher Harrington

Associate Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4210

Educational Background and Business Experience

Year of Birth: 1990

Designations: CFP® (Certified Financial Planner)

Education: Miami University – B.S. Finance

Business Background (preceding 5 years):

07/20 to Present Segall Bryant & Hamill, LLC

Associate Portfolio Manager

03/16 – 06/20 Segall Bryant & Hamill, LLC

Marketing Associate

Disciplinary Information

J. Christopher Harrington has no disciplinary disclosures to be reported.

Business Activities

J. Christopher Harrington is not involved with any other material investment-related business.

Additional Compensation

J. Christopher Harrington receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Kenneth A. Harris

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1955

Designations: CFA (Chartered Financial Analyst)

Education: University of Arizona – B.B.A., Finance and Economics

University of Colorado – M.B.A., Finance

Business Background (preceding 5 years):

06/18 to Present Segall Bryant & Hamill, LLC

Senior Fixed Income Portfolio Manager

05/16 to 05/18 Denver Investments

Partner, Director of Fixed Income Portfolio Management, Portfolio

Manager

01/06 to 04/16 Denver Investments

Partner, Fixed Income Portfolio Manager

01/00 to 12/05 Denver Investments

Vice President, Fixed Income Portfolio Manager

Disciplinary Information

Kenneth Harris has no disciplinary disclosures to be reported.

Other Business Activities

Kenneth Harris is not involved with any other material investment-related business.

Additional Compensation

Kenneth Harris receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Darren G. Hewitson

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1985

Designations: CFA (Chartered Financial Analyst)

Education: University of Glasgow, Scotland – B.A.c.c., Accountancy with International

Accounting

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

07/08 to 05/18 Denver Investments

Partner, Portfolio Manager

Disciplinary Information

Darren Hewitson has no disciplinary disclosures to be reported.

Other Business Activities

Darren Hewitson is not involved with any other material investment-related business.

Additional Compensation

Darren Hewitson receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Gregory C. Hosbein

Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4131

Educational Background and Business Experience

Year of Birth: 1964

Designations: CFA (Chartered Financial Analyst)

Education: Boston College – B.S., Finance

DePaul University – M.B.A., Finance

Business Background (preceding 5 years):

03/97 to Present Segall Bryant & Hamill, LLC

Director of Fixed Income

Disciplinary Information

Gregory Hosbein has no disciplinary disclosures to be reported.

Other Business Activities

Gregory Hosbein is not involved with any other material investment-related business.

Additional Compensation

Gregory Hosbein receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Troy A. Johnson

Director of Fixed Income Research Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1970

Designations: CFA (Chartered Financial Analyst)

Education: Montana State University – B.S., Business and Finance

University of Wisconsin – M.S., Business and Finance

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Director of Fixed Income Research

06/07 to 05/18 Denver Investments

Partner, Director of Fixed Income Research, Portfolio Manager, Credit

Research Analyst

Disciplinary Information

Troy Johnson has no disciplinary disclosures to be reported.

Other Business Activities

Troy Johnson is not involved with any other material investment-related business.

Additional Compensation

Troy Johnson receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

John M. Lafferty, Jr.

Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312)-474-5962

Educational Background and Business Experience

Year of Birth: 1975

Designations: None

Education: Yale University – B.A., Political Science

Northwestern University - M.B.A., Finance and Marketing

Business Background (preceding 5 years):

06/04 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

Disciplinary Information

John Lafferty has no disciplinary disclosures to report.

Other Business Activities

John Lafferty is not involved with any other material investment-related business.

Additional Compensation

John Lafferty receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Chad A. McDonnell

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1972

Designations: CFP® (Certified Financial Planner)

Education: University of Colorado – B.A., Kinesiology

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

03/10 to 05/18 Denver Investments

Vice President, Portfolio Manager

Disciplinary Information

Chad McDonnell has no disciplinary disclosures to be reported.

Other Business Activities

Chad McDonnell is not involved with any other material investment-related business.

Additional Compensation

Chad McDonnell receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Thomas P. McGrath

Senior Wealth Advisor 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-6724

Educational Background and Business Experience

Year of Birth: 1980

Designations: CFA (Chartered Financial Analyst)

Education: Miami University – B.S., Finance and Management Information Systems

Northwestern University Kellogg School of Management – M.B.A.,

Finance

Business Background (preceding 5 years):

09/17 to Present Segall Bryant & Hamill, LLC

Senior Wealth Advisor

11/13 to 09/17 MSCI, Inc.

Vice President

Disciplinary Information

Thomas McGrath has no disciplinary disclosures to report.

Other Business Activities

Thomas McGrath is not involved with any other material investment-related business.

Additional Compensation

Thomas McGrath receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Philip L. Hildebrandt, Chief Executive Officer, (312) 474-4117. Mr. Hildebrandt monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

Keith W. Minogue

Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4130

Educational Background and Business Experience

Year of Birth: 1971

Designations: CFA (Chartered Financial Analyst)

Education: Loyola University of Chicago – B.B.A., Finance

University of Chicago – M.B.A., Finance, Accounting and Economics

Business Background (preceding 5 years):

01/07 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

Disciplinary Information

Keith Minogue has no disciplinary disclosures to report.

Other Business Activities

Keith Minogue is not involved with any other material investment-related business.

Additional Compensation

Keith Minogue receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Scott H. Newhall

Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4253

Educational Background and Business Experience

Year of Birth: 1971

Designations: CFA (Chartered Financial Analyst)

CFP® (Certified Financial Planner)

Education: Pomona College – B.A., Mathematical Economics

Business Background (preceding 5 years):

10/15 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

04/06 to 09/15 Trees Investment Counsel

President

Disciplinary Information

Scott Newhall has no disciplinary disclosures to report.

Other Business Activities

Scott Newhall is not involved with any other material investment-related business.

Additional Compensation

Scott Newhall receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Shaun P. Nicholson

Senior Portfolio Manager 14755 North Outer Forty, Suite 208 Chesterfield, MO 63017 (636) 681-1187

Educational Background and Business Experience

Year of Birth: 1978

Designations: None

Education: Seton Hall University – B.S., Finance

University of Missouri St. Louis – M.B.A., Business

Business Background (preceding 5 years):

07/11 to Present Segall Bryant & Hamill, LLC

Associate Portfolio Manager

Disciplinary Information

Shaun Nicholson has no disciplinary disclosures to report.

Other Business Activities

Shaun Nicholson is not involved with any other material investment-related business.

Additional Compensation

Shaun Nicholson receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Mark Dickherber, Senior Portfolio Manager, (636) 777-7833. Mr. Dickherber monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

Meghan S. O'Donnell

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1970

Designations: None

Education: University of Denver – B.S., Finance and Marketing

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

05/02 to 05/18 Denver Investments

Partner, Portfolio Manager

Disciplinary Information

Meghan O'Donnell has no disciplinary disclosures to be reported.

Other Business Activities

Meghan O'Donnell is not involved with any other material investment-related business.

Additional Compensation

Meghan O'Donnell receives compensation for providing advisory services solely from her responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Jeffrey C. Paulis

Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4351

Educational Background and Business Experience

Year of Birth: 1980

Designations: CFA (Chartered Financial Analyst)

Education: St. Louis University – B.S., Business Administration

University of Chicago – M.B.A. Finance, Accounting and Economics

Business Background (preceding 5 years):

01/03 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

Disciplinary Information

Jeffrey Paulis has no disciplinary disclosures to report.

Other Business Activities

Jeffrey Paulis is not involved with any other material investment-related business.

Additional Compensation

Jeffrey Paulis receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Mark Dickherber, Senior Portfolio Manager, (636) 777-7833. Mr. Dickherber monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

Alan B. Polansky

Director of Research and Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-6717

Educational Background and Business Experience

Year of Birth: 1978

Designations: CFA (Chartered Financial Analyst)

Education: Northwestern University – B.A., Economics and Sociology

New York University – M.P.A., Public Administration

Business Background (preceding 5 years):

01/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

07/06 to 12/17 Jewish Federation of Metropolitan Chicago

Senior Director of Investments

Disciplinary Information

Alan Polansky has no disciplinary disclosures to report.

Other Business Activities

Alan Polansky is not involved with any other material investment-related business.

Additional Compensation

Alan Polansky receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Suresh Rajagopal

Director of All/Mid Cap Strategies, 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-6727

Educational Background and Business Experience

Year of Birth: 1968

Designations: CFA (Chartered Financial Analyst)

Education: Alma College – B.A., Liberal Arts

University of Notre Dame - M.B.A, Finance and International Business

Business Background (preceding 5 years):

10/07 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

Disciplinary Information

Suresh Rajagopal has no disciplinary disclosures to be reported.

Other Business Activities

Suresh Rajagopal is not involved with any other material investment-related business.

Additional Compensation

Suresh Rajagopal receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Timothy R. Rich

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1971

Designations: CFA (Chartered Financial Analyst)

Education: Duke University – B.A., Public Policy and History

UCLA-Anderson – M.B.A., Finance and Investment Management

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

05/14 to 05/18 Denver Investments

Vice President, Portfolio Manager

Disciplinary Information

Timothy Rich has no disciplinary disclosures to be reported.

Other Business Activities

Timothy Rich is not involved with any other material investment-related business.

Additional Compensation

Timothy Rich receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Glenn T. Rippey

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1962

Designations: CFA (Chartered Financial Analyst)

Education: University of Colorado – B.A., Political Science

University of Colorado – M.B.A.

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

05/01 to 05/18 Denver Investments

Partner, Portfolio Manager

Disciplinary Information

Glenn Rippey has no disciplinary disclosures to be reported.

Other Business Activities

Glenn Rippey is not involved with any other material investment-related business.

Additional Compensation

Glenn Rippey receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

John N. Roberts, Esq.

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1966

Designations: None

Education: The George Washington University – B.B.A., Finance

University of Denver – J.D., Law

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

11/96 to 05/18 Denver Investments

Partner, Portfolio Manager

Disciplinary Information

John Roberts has no disciplinary disclosures to be reported.

Other Business Activities

John Roberts is not involved with any other material investment-related business.

Additional Compensation

John Roberts receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Jeffrey R. Rode

Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4133

Educational Background and Business Experience

Year of Birth: 1966

Designations: CFA (Chartered Financial Analyst)

Education: Northwestern University – B.S., Economics

Business Background (preceding 5 years):

01/99 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

Disciplinary Information

Jeffrey Rode has no disciplinary disclosures to be reported.

Other Business Activities

Jeffrey Rode is not involved with any other material investment-related business.

Additional Compensation

Jeffrey Rode receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Ralph M. Segall

Chief Investment Officer and Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4110

Educational Background and Business Experience

Year of Birth: 1947

Designations: CFA (Chartered Financial Analyst)

CIC (Chartered Investment Counselor)

Education: Wharton School, University of Pennsylvania – B.S., Economics

University of Chicago – M.B.A.

Business Background (preceding 5 years):

10/94 to Present Segall Bryant & Hamill, LLC

Chief Investment Officer and Senior Portfolio Manager

Disciplinary Information

Ralph Segall has no disciplinary disclosures to be reported.

Other Business Activities

Ralph Segall is not involved with any other material investment-related business.

Additional Compensation

Ralph Segall receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and the private funds offered by Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to Philip L. Hildebrandt, Chief Executive Officer, (312) 474-4117. Mr. Hildebrandt monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

Gregory M. Shea

Senior Portfolio Manager Republic Plaza 370 17th Street, Suite 5000 Denver, CO 80202 (303) 312-5000

Educational Background and Business Experience

Year of Birth: 1978

Designations: CFA (Chartered Financial Analyst)

Education: Washington University – B.S. and M.S.B.A., Finance and Accounting

Business Background (preceding 5 years):

05/18 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

05/08 to 05/18 Denver Investments

Partner, Portfolio Manager, Credit Research Analyst

Disciplinary Information

Gregory Shea has no disciplinary disclosures to be reported.

Other Business Activities

Gregory Shea is not involved with any other material investment-related business.

Additional Compensation

Gregory Shea receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

Reports directly to James D. Dadura, Director of Fixed Income, (312) 474-4123. Mr. Dadura monitors advice provided to clients. In addition, daily trading is reviewed. Performance is reviewed at least quarterly.

Jeffrey L. Slepian

Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4120

Educational Background and Business Experience

Year of Birth: 1960

Designations: Registered CPA (Certified Public Accountant)

Education: University of Illinois – B.A., Accounting

University of Chicago – M.B.A., Finance

Business Background (preceding 5 years):

10/94 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

Disciplinary Information

Jeffrey Slepian has no disciplinary disclosures to be reported.

Other Business Activities

Jeffrey Slepian is not involved with any other material investment-related business.

Additional Compensation

Jeffrey Slepian receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

M. Jay Trees

Senior Portfolio Manager 540 West Madison St, Suite 1900 Chicago, IL 60661 (312) 474-4219

Educational Background and Business Experience

Year of Birth: 1944

Designations: CFA (Chartered Financial Analyst)

CIC (Chartered Investment Counselor)

Education: Princeton University – B.A., Economics

University of Chicago – M.B.A., Finance

Business Background (preceding 5 years):

10/15 to Present Segall Bryant & Hamill, LLC

Senior Portfolio Manager

01/99 to 09/15 Trees Investment Counsel

Chairman

Disciplinary Information

M. Jay Trees has no disciplinary disclosures to be reported.

Other Business Activities

M. Jay Trees is not involved with any other material investment-related business.

Additional Compensation

M. Jay Trees receives compensation for providing advisory services solely from his responsibilities at Segall Bryant & Hamill and from no other source.

Supervision

SUMMARY OF PROFESSIONAL DESIGNATIONS

The Summary of Professional Designations is provided to assist you in evaluating the professional designations and minimum requirements of our investment professionals to hold these designations.

CFA - Chartered Financial Analyst

Issued by: CFA Institute

Prerequisites/Experience Required: Candidate must meet one of the following requirements:

- Undergraduate degree and 4 years of professional experience involving investment decisionmaking, or
- 4 years qualified work experience (full time, but not necessarily investment related)

Education Requirements:

• Study Program (300 hours of study for each of the 3 levels)

Examination Type:

• 3 course exams

Continuing Education/Experience Requirements: None

CFP® – Certified Financial Planner

Issued by: CFP Board

Prerequisites/Experience Required: Candidate must meet the following requirements:

- Undergraduate degree
- 6000 hours of qualified work experience

Education Requirements:

• Coursework in 8 major personal financial planning areas plus a capstone course.

Examination Type:

• The exam consists of two 3-hour sessions with 170 multiple choice questions (stand-alone question and sets of question associated with short scenarios or lengthier case histories.

Continuing Education/Experience Requirements: 30 hours of continuing education (CE) accepted by CF Board every two years

<u>CIC – Chartered Investment Counselor</u>

Issued by: Investment Adviser Association (IAA)

Prerequisites/Experience (See CFA):

Candidates must meet all of the following criteria in order to be awarded the CIC Charter:

- 1. Be employed by a member firm of the IAA in an eligible occupation position at the time the CIC charter is awarded. (Eligible occupation means more than 50% of candidate's overall duties consists of some combination of investment counseling and portfolio management activities.)
- 2. Must demonstrate a minimum of five (5) cumulative years' work experience in one or more eligible occupational positions prior to the time the CIC charter is awarded and that they have been employed by a member firm of the IAA in an eligible occupational position for at least one (1) year.
- 3. Must have completed successfully the Chartered Financial Analyst (CFA) examinations and hold the CFA charter.
- 4. Must provide work and character references
- 5. Must specifically endorse the IAA's Standards of Practice and complete a professional ethical conduct questionnaire.

CPA – Certified Public Accountant

Issued by: Each state administers the examination, but the examination is made up and graded by the American Institute of Certified Public Accountants. The CPA license is issued at the state or jurisdiction level.

Prerequisites/Experience/Education Requirements:

- To take the examination to become licensed as a certified public account, <u>you must meet your state's requirements for education, experience, and knowledge</u>. Most states now require 150 semester hours of university education.
- You must be declared eligible for the examination, and subsequently licensed, by the board of accountancy in one of the 54 U.S. jurisdictions.
- An individual become eligible for the exam by meeting specific requirements as determined by the board of accountancy for the jurisdiction for which they are applying.
- Because they use the Uniform CPA Examination, most states recognize the validity of licenses from other state. Requirements for experience and education vary, but states generally allow you to claim credit for successful completion of the examination in another state.

Examination Type:

- There are four parts to the examination:
 - (1) Auditing & Attestation
 - (2) Financial Accounting & Reporting (business enterprises, not-for-profit organizations and governmental entities)
 - (3) Regulation (professional responsibilities, business law, and taxation)
 - (4) Business Environment & Concepts
- Each of the four parts of the examination is graded on a scale of 0 to 100. The minimum passing score is 75.

Continuing Education:

 CPAs must adhere to the continuing education requirements set forth by the State Board of Accountancy of the state where a CPA license is held. The requirements for continuing professional education vary from state to state.