



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
OFFICE OF COMPLIANCE INSPECTIONS AND EXAMINATIONS
BOSTON REGIONAL OFFICE
33 ARCH STREET, 24TH FLOOR
BOSTON, MA 02110

Examination Information Request List

Examination Period

Information is requested for the period March 1, 2015 through March 31, 2017 (the "Examination Period"), unless otherwise noted.

Organizing the Information to be Provided

- Submission deadline - As noted above, the information should be provided to the examination Staff by April 28, 2017. Information provided is responsive to more than one request item, you may provide it only once and refer to it when responding to the other request item numbers. If any request item does not apply to your business, please indicate "N/A" (not applicable).
- Submission format - In order to efficiently process the material assembled for the Staff's review, for each item number below, upload the information to Accellion in a folder using the syntax: item number and a brief description of the item number, examples as follows: 1. Slide deck, 2. Outside positions, 3. Joint ventures/other businesses, etc. Please see the instructions for uploading the materials in Exhibit I. It is not necessary to label the items responsive to the request using that syntax. Provide any PDFs in a searchable format. If the Staff requests that a document be produced in Excel and the Adviser is providing bates-stamped documents, it is acceptable to provide both the Excel and a bates-stamped PDF copy of the Excel file. Please note that Accellion cannot be used with a Chrome web browser.
- Privilege claims - If the Adviser claims attorney-client privilege or work product on any of the below items, in full or in part, the Adviser must provide a privilege log contemporaneously with the production. The log should include: (1) the identity and position of the creator(s) of the document; (2) the identity and position of all persons or entities known to have been furnished the document or a copy of the document or informed of its substance; (3) the creation date; (4) a brief description of the document including its subject-matter, (5) the reason the document is not being produced (including the specific privilege being claimed, e.g., attorney-client or work product); and (6) the specific examination request to which the document relates.
- To the extent that a particular item is not applicable, provide a brief explanation why.

Documents to be Produced

1. Slide deck for the Adviser to present during an on-site discussion with the Staff that outlines the following:

- A. Adviser's and its related persons' business (including any services provided by affiliates to the Adviser's clients). Throughout the Staff's requests, related persons should include all entities that are commonly controlled by, under common control with, or with any common ownership with, the Adviser,

- B. Adviser's organization chart showing ownership percentages of the Adviser and control persons, and a schedule or chart of all related persons. Describe the relationship between the Adviser and its related persons. Please include Adviser's organizational structure and personnel structure, including locations, and detail regarding any strategic relationships (with any fund or firm investors);
 - C. Client profile;
 - D. Each fund's structure chart;
 - E. Lifecycle stage of each fund, *e.g.*, fundraising, investment period, harvesting, liquidation. Note any funds in an extension period, along with the date of the extension(s) and any funds where management fees have been waived, including the effective date of the waiver;
 - F. The portfolio management and trading processes and the role of any oversight committees;
 - G. Fundraising process and current status;
 - H. Compliance framework (including the use of all third-party service providers who assist with compliance (i.e., law firms and consultants));
 - I. All sources of fees or other compensation received by the Adviser or any related persons;
 - J. General expense allocation process between the funds, the Adviser, and any related persons;
 - K. Structure and use of any operating partners, strategic, senior advisors and/or consultants; and
 - L. Oversight process with respect to the potential receipt of material, non-public information.
2. A list of names of public and private companies for which employees of the Adviser or its related persons serve as officers, on the board of directors, or creditors' committees. For the past 3 years, please detail the employee name, the position(s) held, the relevant company, and the dates such position(s) were held. Please indicate whether there have been any client or access person transactions in any such company.
 3. Names of any joint ventures or any other businesses (whether public or private) in which the Adviser or any officer, director, or employee participates or has any interest (other than their employment with the Adviser), including a description of each relationship. Please include a description of any services that such joint venture or business provides to portfolio companies held by clients, and total fees or billings paid by a client directly or indirectly to such entity. State whether there has been any personal or firm trading by any Adviser personnel or the Adviser in such businesses.
 4. In Excel, a list of current full-time and part-time employees, interns, consultants, secondees, partners, directors, officers, strategic advisors, operating advisors, senior advisors or similar, as applicable. Provide titles, areas of responsibility, start and departure dates (as applicable), location(s), whether the individual has been deemed an access persons for purposes of the Adviser's Code of Ethics and whether the individual is exempt from any of the Adviser's other compliance policies and procedures. Note if any of the above individuals resigned, were disciplined for compliance purposes, or terminated, along with the dates and reason for termination, discipline or resignation. Provide any executed separation agreement.

If any of the preceding information changed during the Examination Period (i.e., roles changed or whether an individual was subject to the Adviser's compliance policies and procedures changed), provide detail. Also include an organizational chart depicting the reporting lines of the above individuals down to the manager position level.

5. Compliance materials:

- A. Policies and procedures that were in effect at any point during the Examination Period;
- B. Annual compliance review reports produced covering the Examination Period (if written reports were not produced, provide a written summary of all annual compliance reviews conducted during the Examination Period as well as the results of those reviews);
- C. A copy of any compliance-related reports produced by a consultant or other third-party during the Examination Period;

- D. Any other written desktop or operating procedures relied upon in implementing the compliance program; and
- E. A written description and any documentation or records maintained by the Adviser showing a record of any breach of the Adviser's compliance policies and procedures during the Examination Period and of any action taken as a result of such non-compliance.

6. Marketing, advertising, fundraising and investor reporting:

- A. In connection with marketing or fundraising and investor or client reporting during the Examination Period, the most recent version(s) of the following:
 - i. General firm presentation;
 - ii. Product-specific presentation for each product-type and strategy within each product-type;
 - iii. Client quarterly letter (or equivalent);
 - iv. Submitted, comprehensive RFP/DDQ response to prospective investor or to an existing investor; and
 - v. Annual meeting materials provided to investors (include for all meetings held during the Examination Period).
- B. A log of all presentations provided to existing or prospective investors during the Examination Period that contains the following data-points:
 - i. Title of presentation with name(s) of preparer and reviewer;
 - ii. Approximate date distributed;
 - iii. General description of the recipient or recipient group; and
 - iv. Whether the piece was presented in a one-on-one meeting.

7. In Excel, the Adviser's balance sheet, trial balance, income statement, cash receipts and disbursements journal, general ledger and cash flow statements for the two most recent fiscal years and the most current year to date. Indicate whether the financial statements are audited and, if so, during which period and by which firm(s). Finally, include a copy of any such audited financial statements.

8. List of companies/firms, clients, and/or investors for which the Adviser and/or its related persons provided or arranged for loans, equity sales and/or promissory notes. In addition, please provide details for any such loans or promissory notes outstanding at any time during the Examination Period.

9. A trade blotter (i.e., purchases and sales journal) that lists all transactions (including all trade errors, cancellations, re-bills, and reallocations) in securities and other financial instruments (including privately offered funds) for: funds, separately managed accounts, proprietary and/or trading accounts, and access persons during the Examination Period. Note: this request is not asking for productions of purchase and sales of interests in any client vehicles by investors. Please include access persons' transactions to the extent available in a readily producible format, including transactions in non-discretionary, managed accounts of the access person and indicate whether such trades are executed within the Adviser's or a related persons' trade order management system. The requested format for the production of client trading activity is shown in Exhibit II.

10. For each privately offered fund (please include special purpose vehicles or other entities formed for investment purposes) for which the Adviser, its officer(s), or any related person serves as adviser, general partner, or manager, and for all proprietary and employee investment vehicles, provide the following, as applicable:

- A. The fund's/vehicle's organizational and offering documents (Operating Agreement, Limited Partnership Agreement, Private Placement Memorandum, Articles of Incorporation, Bylaws, standard Due Diligence Questionnaire provided at the time of the offering, etc.);
- B. All forms of subscription agreements utilized at any point in any offering of the fund interests;
- C. The fund's/vehicle's most recent audited financials;
- D. The fund's/vehicle's most recent due diligence questionnaire;
- E. Monthly performance shown in percentage terms for the past 5 years (or inception if shorter);
- F. Monthly dollar profit and loss for the past 5 years (or inception if shorter); and
- G. Performance figures presented to fund investors for the past 5 years (if other than in the format, time period or otherwise as requested in E and F above);
- H. In Excel:
 - i. Name as shown in organizational documents (as amended);
 - ii. Domicile (country);
 - iii. Short description of investment strategy;
 - iv. If fund/vehicle is part of a master/feeder structure, the full name and domicile of each master fund;
 - v. Number of investors as of March 31, 2017;
 - vi. Total net assets as of March 31, 2017;
 - vii. Amount, if any, of Adviser's equity interest in each fund as of March 31, 2017;
 - viii. Amount, if any, of Adviser's related persons' (including individuals) interest as of March 31, 2017;
 - ix. Date the fund/vehicle began accepting investors;
 - x. Liquidity profile including lock up periods for both initial and subsequent investments;
 - xi. Whether the fund/vehicle is currently closed to new investors and when it closed;
 - xii. The management fee charged for the most recent billing period (dollar amount and percentage);
 - xiii. Whether the fund/vehicle is currently above its high-water mark;
 - xiv. Whether fund is in carry;
 - xv. Whether fund is in claw-back;
 - xvi. Each custodian used by the fund/vehicle; xv11. Primary fund/vehicle counsel; and
 - xvii. Auditor of the fund/vehicle.

11. For clients other than private funds and proprietary and employee investment vehicles, in Excel, the information below for all current advisory clients:

- A. The account number;
- B. The account name;
- C. The account's fair market value as of March 31, 2017;
- D. Whether the client is a related person or a proprietary account;
- E. The type of account;
- F. The strategy executed by the client (e.g., Value-Add, Core Plus, Opportunistic);
- G. The account custodian and location;
- H. Whether or not the Adviser has discretionary authority;
- I. Whether the Adviser, an officer, an employee, or a related person (including an individual) acts as trustee, co-trustee, or successor trustee, has full power of attorney for the account or provides any other service to the client;
- J. Whether Adviser or related persons are deemed to have custody of, possession of or access to the client's assets, and if so, the location of the assets;

- K. The client's portfolio manager(s);
 - L. The value of each client's account that was used for purposes of calculating its advisory fee for the most recent billing period; and
 - M. Whether the client pays a performance fee and the most recent account performance figures.
12. The names of securities and other financial interests held in each fund/vehicle listed in items 10& 11. The requested format for this production is shown in Exhibit III.
13. In Excel, include the following related to service providers:
- A. List of service providers used by the Adviser or any private fund managed by the Adviser, its officer(s), or any related persons during the Examination Period;
 - B. Whether the service provider is a related person of the Adviser or its personnel (including if any senior service provider personnel are affiliated with the Adviser or its personnel);
 - C. Brief description of the services they perform for the Adviser or the funds;
 - D. Any compensation paid to the service provider during the Examination Period;
 - E. Whether that compensation was paid in hard and/or soft dollars; and
 - F. Whether formal due diligence was conducted on the service provider prior to engaging and after engagement.
14. A list of all committees utilized by the Adviser or its private fund clients during the Examination Period, including a description of each committee's responsibilities, meeting frequency, whether minutes are maintained, a list of the members (along with their titles) of each committee, the agendas for each meeting (other than a weekly investment committee meeting or similar) during the Examination Period, and any materials pertaining to the most recent meeting of each such committee.
15. In Excel, a log of any side letters in place at any time during the Examination Period between any client and any investor or beneficial owner. Include the parties to such, the inception date, and a brief description of the side letter provisions.
16. In Excel, a log of any threatened, potential, pending, and settled litigation or arbitration involving the Adviser, the Adviser's related persons, or any "supervised person" (if it relates to the individual's association with the Adviser or a securities-related matter) including a description of the allegations, the status, and a brief description of any "out of court" or informal settlement. Note that "supervised person" is any partner, officer, director (or other person occupying a similar status or performing similar functions), or employee of an investment adviser, or other person who provides investment advice on behalf of the investment adviser and is subject to the supervision and control of the investment adviser (defined in Section 202(a)(25) of the Advisers Act). If none, please provide a written statement to that effect.
17. A list of all acronyms and definitions utilized by the Adviser, including all abbreviations used within any trading system and any other data repository for trading and P&L data.
18. As applicable, for each fund/client describe/provide the following:
- A. How many trading desks/units are utilized;
 - B. Name(s) of portfolio managers working with each trading desk and the asset classes (e.g. equities, interest rate products) and strategies (e.g. discretionary macro, statistical arbitrage) they are responsible for; and

C. Monthly capital and gross trading P&L associated to each portfolio manager by fund for the Examination Period.

19. A copy of all agreements between the Adviser, and/or the Adviser's related persons and portfolio companies held by a client or fund managed by the Adviser. For all staff requests, include as related persons all entities and persons that are commonly controlled by, under common control with, or with any common ownership as the Adviser. In addition, identify any current or former portfolio companies that entered into multi-year fee agreements with the Adviser and/or the Adviser's related persons which, upon the sale of the company by the fund, would require the company to pay fees due to be earned by the Adviser or the Adviser's related persons in the future.
20. A list of all compensation received over the past 3 years by the Adviser and/or the Adviser's related persons and also including operating partners, strategic advisors, senior advisors or similar, as applicable. Exclude management and performance fees as well as compensation/salary of Adviser's officers and employees paid by the Adviser to the extent not reimbursed by the funds. Include fees from fund investments. Provide in Excel and include the information detailed below.
 - A. Date received;
 - B. Payee;
 - C. Payer;
 - D. Amount;
 - E. Type, e.g., transaction fee, monitoring fee, director fee, other fee (please describe);
 - F. Amount credited to investors/fund, if applicable;
 - G. Indicate whether the compensation is associated with a portfolio company/underlying investment/property, as applicable, and if so, the name of the entity;
 - H. Copy of any agreement(s), including any amendment(s), pursuant to which the service was provided. If otherwise provided herein, reference the request number.
21. A listing of any personnel who were employees or who served in some other capacity of a portfolio company/underlying investment/property, as applicable, for which they were compensated (other than as a Director) at the same time they were being compensated by the Adviser or its affiliates.
22. In Excel, a schedule of each expense/fee recovered by the Adviser (or any of the Adviser's related persons) from/for the funds during the past 3 years. Include the following information:
 - A. Fund vehicle name;
 - B. Date received;
 - C. Amount;
 - D. Type of fee/expense;
 - E. If a fee is shared between the fund and the Adviser (or any of the Adviser's related persons), provide the allocation methodology used;
 - F. If an expense is shared across funds, provide the allocation methodology used and the frequency with which such methodology is reviewed;
 - G. A description of the services provided; and
 - H. Whether the fee or expense reimbursement was offset either partially or entirely by other revenue.
23. In Excel, a list of all surveillance/exception reports, or other similar reports, related to any aspect of the Adviser's compliance program monitoring and/or testing. Note that this response should not be limited to reports created by the compliance team if other teams such as outside counsel, risk management, operations, trading or portfolio management produce reports that support monitoring and/or testing.

Provide the following detail for each such report: name of report, purpose, frequency, and person(s) responsible for running and if different, for reviewing such reports.

24. For each limited partnership's annual meeting and for meetings of the Limited Partners Advisory Committee (or equivalent) provide a list of attendees, and copies of materials distributed for, or presented at, each such meeting during the Examination Period.
25. Meeting minutes of the funds' Board of Directors during the Examination Period, to the extent available, and copies of materials distributed for, or presented at, each such meeting.
26. In Excel, copies of any financial records, including cash receipts/cash disbursements journal(s), which would reflect the schedule of payments of all expenses by the private funds, related General Partners, and special purpose vehicles and/or other entities established for investment purposes. Provide any supporting documentation that demonstrates how any shared expenses were allocated among the private funds, the Adviser, and other entities.
27. Audit and governance reporting:
 - A. For any independent audits, third-party attestations or agreed-upon procedures, and/or external auditor internal controls engagements:
 - i. Any SAS 114 or 115 communications from the independent auditor of the funds or the independent auditor of the Adviser;
 - ii. Any engagement letters (if no engagement letters were executed, please provide detail regarding the purpose of the audit or engagement); and
 - iii. Any reports reflecting results or status of reports to be produced.
 - B. Any internal audit presentations to committees of Board(s) of Directors (of the funds and/or the Adviser), client Advisory Boards, or similar committees for the past 5 years.
 - C. Detail of all potential and/or actual conflicts-of-interest presented to any Advisory Board/Committee, or similar, for consideration and/or approval, including any materials presented, for the past 5 years.
28. A detailed breakdown of organizational expenses for each fund organized in the 5-year period ended March 31, 2017, to the extent that those expenses were borne by the funds rather than the Adviser.
29. In Excel, in one spreadsheet with a single tab, a listing of the investors in each of the funds/vehicles, including the following columns:
 - A. Fund/vehicle name;
 - B. Investor name;
 - C. Whether the investor is a related person, affiliated person, or proprietary account;
 - D. Any consultant associated with the investor/account;
 - E. Whether such investor is/was advised by a member of any Limited Partners Advisory Committee (or equivalent), and if applicable, identity the committee member and provide a statement as to whether the committee member or the investor they represent have any ownership interest or other affiliation with the Adviser other than as investors in the fund;
 - F. Type of account (use categories provided in Question 16 of Form PF); and
 - G. Capital account balance as of March 31, 2017.

30. A list of all transactions that occurred between the Adviser's funds/clients/investors during the Examination Period, e.g., cross transactions (include transactions between current funds/clients/investors and former funds, clients, or investors). In addition, include all transactions between a current or former fund/client/investor and the Adviser, the Adviser's affiliated entities, or the Adviser's related persons during the Examination Period.

For each transaction, indicate the following:

- A. Name of investment and a brief description investment type;
- B. Primary person responsible for transaction;
- C. Transaction date (or date of loan or transfer of interest);
- D. Quantity;
- E. Dollar amount of sale, purchase, loan or investment;
- F. Buyer;
- G. Seller;
- H. Fees paid to any affiliate in connection with such transaction, e.g., disposition fees, financing fees, acquisition fees;
- I. Payee of each fee referenced above;
- J. Payer of each fee referenced above;
- K. Copies of any appraisals, fairness opinions, etc. obtained in connection with each transaction;
- L. Disclosure provided to the Limited Partners Advisory Committee (or equivalent) and investors in connection with each of the aforementioned investments, if applicable; and
- M. Documentation substantiating approval/consent by the Limited Partners Advisory Committee and/or investors in connection with each of the investments, if applicable.

31. Material non-public information monitoring:

- A. A list of all independent research providers (*e.g.*, expert networks, consultants, political intelligence firms, and expert advisory panels) utilized by the Adviser during the Examination Period;
- B. For all such service providers, the corresponding contract/terms of use, fee schedule, proof of payments, amount paid during the Examination Period to the service providers and/or to individuals employed by the service providers, method of payment (*i.e.*, soft dollars);
- C. In Excel, a log of all discussions with independent research providers, detailing date, participants, topic, company/companies that were being researched, whether the discussion was chaperoned, and whether the discussion was in person;
- D. All training materials provided to the Adviser's personnel pertaining to receipt and control of material non-public information;
- E. All written policies and procedures pertaining to receipt and control of material non-public information, if not otherwise included in a prior response;
- F. To the extent not provided in response to Request 31e. above, all written policies and procedures governing meetings or other communications between Adviser's investment personnel and personnel of publicly-traded issuers in which funds managed by the Adviser invest;
- G. All exception reports or other documents that demonstrate implementation of the policies and procedures set forth in Requests 31e. and 31f. above. Include documents showing resolution of all such exceptions;
- H. All compliance calendars or other information indicating whether the Adviser's investment personnel have met or otherwise communicated with personnel of publicly-traded issuers in which funds managed by Adviser invest;

- I. Records of chaperoning or other compliance oversight of the communications identified in Requests 31h. above;
 - J. If the Adviser uses A2 Access, Markit Calendar, or any other platform or program to assist it in tracking corporate access or communications between its investment professionals and outside persons, provide a description of the program and how the Adviser uses the program. In addition, provide an Excel download of data in all such programs; and
 - K. Copies of Restricted, Watch, or similar lists in effect since March 31, 2015 with notes reflecting why the company is on those lists.
32. In Excel, a log of any non-disclosure agreements ("NDAs") entered into by the Adviser during or covered by the Examination Period (exclude NDAs entered into with employees). Include the following information: subject matter (e.g., systems vendor, potential deal, etc.), parties to the agreement (with respect to the Adviser's related persons, note the affiliation to the Adviser), effective date, expiration date, whether there are any standstill provisions and if so, any termination date of the standstill, and subject/target companies covered by any deal-related NDAs.
33. A list of all principal transactions that occurred between a current or former fund/client/investor and the Adviser or the Adviser's related persons during the Examination Period. For each such transaction, please provide transaction date, name of investment, quantity, dollar amount of sale/purchase, buyer, seller, a brief description, etc. In addition, please provide copies of approvals obtained and disclosures provided to the client, investors, or advisory committees.
34. A list of secondary transactions which occurred during the Examination Period including the names of the seller, buyer, and amount of commitment transferred. Please include any instances where an investor has made a request to transfer interests but has not yet consummated the transaction and instances where transfers were not approved by the general partner. Please include documentation of any fees and expenses incurred with the transfer of interests.
35. A list of the valuation methodologies the Adviser utilized during the Examination Period. In addition, detail any changes in valuation methodology for specific investments and provide a written explanation of the rationale for each such change.
36. A copy of any third-party valuation reports produced during the Examination Period.
37. A log of any client/investor complaints, reflecting both oral and written complaints. For each complaint, please describe action taken or resolution and provide any written correspondence provided in response to the complaint (including email correspondence, if applicable).
38. A log of any amendments made to each private fund's organizational documents over the last 5 years.
39. A list of all parties to whom cash referral fees were paid during the Examination Period for soliciting investors and the total compensation paid to each solicitor for the periods ending March 31, 2016 and March 31, 2017. In addition, copies of any agreements executed with any third-party solicitors, any correspondence with such solicitors, and any separate disclosure documents disseminated by such solicitors.
40. Any third-party performance verification, examination, or audit reports and copies of any engagement letters with said service providers.

41. A list of all completed RFPs provided to prospective investors or consultants.
42. A list of all third-party consultants for whom the Adviser completed questionnaires or otherwise corresponded with during the Examination Period.
43. A list of all third-party consultants to whose clients the Adviser made a presentation in an effort to obtain or retain such entity as an advisory client.
44. A list of all third-party consultants from whom the Adviser or any of its related persons purchased any product or service (including any payments connected to conferences sponsored or hosted by the consultant) during the Examination Period.

(Note: for the following request numbers 45-50, "confidentiality/whistleblower topics" means any of the following: (a) confidentiality or dissemination of information, (b) communications with outside parties, (c) communications with regulators, and (d) whistleblowing.)

45. All compliance or other policies and procedures that were in effect during the Examination Period for the Adviser that pertain to confidentiality/whistleblower topics.
46. Documents pertaining to communications with officers, directors, employees, or contractors regarding any violations or potential violations of (a) the compliance policies and procedures produced in response to Item X or (b) the Adviser's Code of Ethics, relating to confidentiality/whistleblower topics.
47. All documents pertaining to any disciplinary or legal action or potential disciplinary or legal action with respect to any officer, director, employee, or contractor of the Adviser that relates to confidentiality/whistleblower topics.
48. All amendments to the compliance policies and procedures, including the Code of Ethics, made during the Examination Period pertaining to confidentiality/whistleblower topics.
49. If the confidentiality and non-disparagement clauses (or clauses with similar effect) in the employment, separation, or severance agreements that the Adviser entered into during the Examination Period are standard, provide a copy of the agreement containing those clauses. However, if the confidentiality or non-disparagement clauses (or clauses with similar effect) have varied, provide all agreements containing such variations (with names of employees and amounts of payments redacted).
50. The following information regarding any third-party placement agents utilized during the Examination Period:
 - A. The name of the placement agent;
 - B. The name of the individuals at the placement agent who worked on behalf of the Adviser/fund vehicles;
 - C. The agreements in place with the placement agent;
 - D. The fund vehicles for which the placement agent fundraised;
 - E. Detail of the payments made to the placement agent firm during the Examination Period;
 - F. The current status of the placement agent agreement; and
 - G. The name of any LPs in any of the funds that were obtained by each individual at a placement agent.

Hedge Fund - additions:

51. Any supporting valuation information or analyses for the Examination Period for all fair valued investments.
52. Copies of any marketing materials that contain hypothetical performance such as those that are model based or back-tested.
53. List of all PIPE investments that the Adviser participated in during the Examination Period.
54. List of all PIPE investments that were offered to the Adviser during the Examination Period, for which the Adviser did not participate.
55. All initial public offerings and secondary offerings in which clients, proprietary accounts, or access persons participated during the Examination Period and, if not stated in policies and procedures or if the allocation did not follow standard policies and procedures, information regarding how allocation decisions were made. Include the trade date, security, symbol, total number of shares, and participating accounts. For initial public offerings, indicate whether shares traded at a premium when secondary market trading began and provide secondary market purchases and sales for all clients, the Adviser, and the Adviser's related persons. Provide electronically in Excel format.
56. Securities purchased for any client in which the Adviser or an affiliate underwrote or participated as underwriting manager, purchase group, and/or syndicate or selling group and the underwriting date(s).
57. Securities in which the Adviser or an affiliate was a market maker.
58. In Excel, the total commission/transaction dollars paid during the Examination Period for each broker-dealer utilized to execute client transactions.
59. Soft dollar budget or similar document that describes the products and services the Adviser obtains using clients' brokerage commissions, and the arrangements with each broker.
60. A list of all securities owned by the Adviser or its principals not held at a prime broker or custodian.