FORM ADV

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

Prin	nary Business Name: AXIOM	NVESTORS		CRD Number: 10	9605
Ann	nual Amendment - All Sections			Rev. 10/	2021
3/2	27/2024 11:17:36 AM				
WA	•	ruthfully. False statements or omissions tkeep this form updated by filing pe		plication, revocation of your registration, or crimi / General Instruction 4.	 nal
Iter	m 1 Identifying Information				
	•	•	•	. If you are filing an <i>umbrella registration</i> , the ation to assist you with filing an <i>umbrella registra</i>	tion.
Α.	Your full legal name (if you ar AXIOM INVESTORS LLC	e a sole proprietor, your last, first, ar	nd middle names):		
B.	(1) Name under which you pri	marily conduct your advisory busines	ss, if different from Item 1.A.		
	List on Section 1.B. of Schedule	e D any additional names under which	you conduct your advisory busines	S.	
	(2) If you are using this Form	ADV to register more than one inves	stment adviser under an <i>umbrella</i> i	registration, check this box \square	
	If you check this box, complete	e a Schedule R for each relying adviser.			
C.	If this filing is reporting a charname change is of ☐ your legal name or ☐ your		primary business name (Item 1.B	.(1)), enter the new name and specify whether t	he
D.	(2) If you report to the SEC a	the SEC as an investment adviser, y s an <i>exempt reporting adviser</i> , your S Central Index Key numbers assigned I	EC file number:	f your CIK numbers:	
	1109147				
	1109147				
E.	(1) If you have a number ("CF	RD Number") assigned by the FINRA's	s CRD system or by the IARD syste	m, your <i>CRD</i> number: 109605	
	If your firm does not have a CF	RD number, skip this Item 1.E. Do not	provide the CRD number of one of y	our officers, employees, or affiliates.	
	(2) If you have additional <i>CRL</i>	Numbers, your additional <i>CRD</i> numb	oers:		
	· / · 3		No Information Filed		
F.	Principal Office and Place of Bu	siness			
• •	(1) Address (do not use a P.0				
	Number and Street 1:	7. BOX).	Number and Street 2:		
	33 BENEDICT PLACE, 2ND) FLOOR			
	City: GREENWICH	State: Connecticut	Country: United States	ZIP+4/Postal Code: 06830	
	If this address is a private	e residence, check this box: 🗖			
	you are applying for regist which you are applying for	tration, or are registered, with one or registration or with whom you are reg SEC as an exempt reporting adviser, la	more state securities authorities, yo gistered. If you are applying for SEC	at which you conduct investment advisory business ou must list all of your offices in the state or states registration, if you are registered only with the SEC terms of numbers of employees as of the end of yo	to C, or
	(2) Days of week that you no Monday - Friday Coth	ormally conduct business at your <i>prin</i> ner:	ncipal office and place of business:		
	Normal business hours at 9:00AM TO 5:00PM (3) Telephone number at this	t this location:			

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

203-422-8000

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

	the end of your most of	recently completed fiscal year?				
G.	Mailing address if differen	t from your <i>principal office and place</i> of	of husiness address			
О.	Number and Street 1:	them year principal effice and place of	Number and Street 2:			
		Ctata		ZID : 4/Destal Code:		
	City:	State:	Country:	ZIP+4/Postal Code:		
	If this address is a private	e residence, check this box: \square				
Н.	If you are a sole proprieto	r, state your full residence address,	if different from your <i>principa</i>	I office and place of business address in Item 1.F.:		
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
1.	Do you have one or more	websites or accounts on publicly ava	ilable social media platforms	(including, but not limited to, Twitter, Facebook and	Yes •	No O
	LinkedIn)?					
	If a website address serves addresses for all of the other available social media platfo	s as a portal through which to access c er information. You may need to list m	other information you have pub nore than one portal address. L not provide the indivi	cly available social media platforms on Section 1.1. of S blished on the web, you may list the portal without list Do not provide the addresses of websites or accounts of dual electronic mail (e-mail) addresses of employees of	ing In public	
J.	Chief Compliance Officer					
	(1) Provide the name and	contact information of your Chief Cor Compliance Officer, if you have one.	•	n <i>exempt reporting adviser</i> , you must provide the cor rm 1.K. below.	ıtact	
	Name:		Other titles, if any:			
	Telephone number:		Facsimile number, if any:			
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	EL 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
	Electronic maii (e-maii) ad	ddress, if Chief Compliance Officer ha	is one:			
		npany Act of 1940 that you advise fo mber (if any):		you, a <i>related person</i> or an investment company region officer services to you, provide the <i>person's</i> name ar		
K.		tact Person: If a person other than t may provide that information here.	he Chief Compliance Officer i	is authorized to receive information and respond to	questio	ıns
	Name:		Titles:			
	Telephone number:		Facsimile number, if any:			
	Number and Street 1:		Number and Street 2:			
	City:	State:	Country:	ZIP+4/Postal Code:		
	Electronic mail (e-mail) a	ddress, if contact person has one:				
					Yes	No
L.	•	all of the books and records you are ur <i>principal office and place of busines</i>	·	on 204 of the Advisers Act, or similar state law,	•	0
	If "yes," complete Section	1.L. of Schedule D.			Yes	Nο
M.	Are you registered with a	foreign financial regulatory authority?				•
	•	registered with a foreign financial regu s," complete Section 1.M. of Schedule		nave an affiliate that is registered with a foreign financia	al	
					Yes	No
N.	Are you a public reporting	company under Sections 12 or 15(d)	of the Securities Exchange A	Act of 1934?	0	\odot
					Yes	No
Ο.	•	more in assets on the last day of you imate amount of your assets: \$10 billion	ur most recent fiscal year?		0	•

510 billion to less than \$50 billion

	C \$50 billion or more
	For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.
Ρ.	Provide your <i>Legal Entity Identifier</i> if you have one: 549300AT4OLE6P7NTD88
	A legal entity identifier is a unique number that companies use to identify each other in the financial marketplace. You may not have a legal entity identifier.
SEC	CTION 1.B. Other Business Names
	No Information Filed
SEC	CTION 1.F. Other Offices
	No Information Filed
SEC	CTION 1.I. Website Addresses
lir	st your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not nited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.1. for each website or account on a publicly available ocial media platform.
Ac	ddress of Website/Account on Publicly Available Social Media Platform: https://www.linkedin.com/company/axiom-investors
Ad	ddress of Website/Account on Publicly Available Social Media Platform: https://axiom-investors.co.uk/
Ac	ddress of Website/Account on Publicly Available Social Media Platform: https://www.axiominvestors.com
Ac	ddress of Website/Account on Publicly Available Social Media Platform: http://www.axiominvestors.com
Ac	ddress of Website/Account on Publicly Available Social Media Platform: https://www.youtube.com/channel/UCFncxvF40Nk4_nIPvPm4M4A/featured
SEC	CTION 1.L. Location of Books and Records
	omplete the following information for each location at which you keep your books and records, other than your <i>principal office and place of business</i> . You ust complete a separate Schedule D, Section 1.L. for each location.
	ame of entity where books and records are kept: ORTHERN TRUST INTERNATIONAL FUND ADMINISTRATION SERVICES (IRELAND) LTD
	umber and Street 1: EORGES COURT Number and Street 2: 54-62 TOWNSEND STREET
	ty: State: Country: ZIP+4/Postal Code: JBLIN 2 Ireland
lf	this address is a private residence, check this box: \square
	elephone Number: Facsimile number, if any: 33 1 542 2016 353 1 542 2920
Th	nis is (check one):

O other.				
	XIOM CONCENTRATED GLO		E AXIOM GLOBAL SMALL CAP EQUITY FUND, AND TI UND ADMINISTRATION SERVICES (IRELAND) LIMITE	
Name of entity where books and records GLOBAL RELAY COMMUNICATIONS INC.	are kept:			
Number and Street 1:		Number and Street 2:		
1155 AVENUE OF THE AMERICAS City:	State:	FLOORS 38-42 Country:	ZIP+4/Postal Code:	
NEW YORK	New York	United States	10036	
If this address is a private residence, che	ck this box:			
Telephone Number: 866-484-6630	Facsimile numbe 212-504-3163	r, if any:		
This is (check one): O one of your branch offices or affiliates				
o a third-party unaffiliated recordkeeper	·.			
O other.				
Name of entity where books and records COMPLYSCI USA		AS OUTLOOK, BLOOMBERG AN	D MICROSOFT TEAMS FOR COMPLIANCE AND AUDIT	S.
Number and Street 1: 136 MADISON AVENUE		Number and Street 2:		
City: NEW YORK	State: New York	Country: United States	ZIP+4/Postal Code: 10016	
If this address is a private residence, che	ck this box:			
Telephone Number: 212.327.1533	Facsimile numbe	r, if any:		
This is (check one): O one of your branch offices or affiliates				
a third-party unaffiliated recordkeeper	. .			
O other.				
	LATED TO EMPLOYEE PERSO ERTAINMENT AND OTHER A		LE SECURITIES. EMPLOYEE PRE CLEARANCE REQUE CODE OF ETHICS AND CORPORATE POLICIES AND	.STS
Name of entity where books and records INSTITUTIONAL SHAREHOLDER SERVICES	•			
Number and Street 1: 702 KING FARM BLVD.		Number and Street 2: SUITE 400		
City:	State:	Country:	ZIP+4/Postal Code:	

one of your branch offices or affiliates.

a third-party unaffiliated recordkeeper.

If this address is a private residence, check this box: \Box							
Telephone Number: 301-556-0500	Facsimile number, 301-556-0491	if any:					
This is (check one): one of your branch offices or affiliates. a third-party unaffiliated recordkeeper. other.							
Briefly describe the books and records kept at this PROXY VOTING RECORDS ARE MAINTAINED IN THE		REHOLDER SERVICES INC.	SYSTEM.				
Name of entity where books and records are kept THE DEPOSITORY TRUST AND CLEARING CORPORA							
Number and Street 1: 570 WASHINGTON BOULEVARD		Number and Street	2:				
3	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07310				
If this address is a private residence, check this b	ох: П						
Telephone Number: 1-888-382-2721	Facsimile number, if	any:					
This is (check one): one of your branch offices or affiliates. a third-party unaffiliated recordkeeper. other. Briefly describe the books and records kept at this AXIOM RELIES ON THE DEPOSITORY TRUST AND CL		ON (DTCC) TO MAINTAIN A	ND PRESERVE TRADE CONFIRMATIONS.				
Name of entity where books and records are kept NORTHERN TRUST HEDGE FUND SERVICES LLC	::						
Number and Street 1: 50 SOUTH LASALLE STREET		Number and Street 2:					
City: CHICAGO	State: Illinois	Country: United States	ZIP+4/Postal Code: 60603				
If this address is a private residence, check this b	ох: 🗖						
Telephone Number: 312 630 6000	Facsimile number 312 267 3703	r, if any:					
This is (check one): one of your branch offices or affiliates.							
a third-party unaffiliated recordkeeper.other.							
Briefly describe the books and records kept at this THE BOOKS AND RECORDS OF AXIOM OFFSHORE OF AXIOM INTERNATIONAL SMALL/MICRO-CAP OPINORTHERN TRUST HEDGE FUND SERVICES, LLC	DPPORTUNITY FUND L						

United States

20850

Maryland

ROCKVILLE

			ty where books and records are kept: RUST COMPANY			
			Street 1: SALLE STREET		Number and Street 2:	
City:	AG	Э		State: Illinois	Country: United States	ZIP+4/Postal Code: 60563
If this	s ac	ddres	ss is a private residence, check this box:			
Telep 312 <i>6</i>			umber: 3	Facsimile number, 312 444-5258	if any:	
			cone): ur branch offices or affiliates.			
⊙ a	thir	d-pa	arty unaffiliated recordkeeper.			
o ot	her	·.				
THE E	30C :GIN	NS A		RUST II (AXIOM U.S NTERNATIONAL EQU	JITY FUND II, AXIOM INTERNA	AXIOM EMERGING MARKETS EQUITY FUND, AXIOM ATIONAL SMALL-CAP EQUITY FUND, AND THE AXIOM
SECTI	ON	1.M	. Registration with Foreign Financial R	egulatory Authori	ties	
				No	Information Filed	
Item 2	SE	EC Re	egistration/Reporting			
SEC re	egis	strati	•	•		C. Complete this Item 2.A. only if you are applying for ng an <i>umbrella registration</i> , the information in Item 2
<i>а</i> р	nnı rov	ial uµ ides		tion and you are n	o longer eligible to register w	through 2.A.(12), below. If you are submitting an with the SEC, check Item 2.A.(13). Part 1A Instruction 2 nese items.
6	7	(1)	are a large advisory firm that either:			
			(a) has regulatory assets under manag	ement of \$100 mill	ion (in U.S. dollars) or more;	or
			(b) has regulatory assets under manag amendment and is registered with		on (in U.S. dollars) or more a	t the time of filing its most recent annual updating
Г		(2)	are a mid-sized advisory firm that had million (in U.S. dollars) and you are eith		s under management of \$25	million (in U.S. dollars) or more but less than \$100
			(a) not required to be registered as an of business; or	adviser with the s	state securities authority of th	ne state where you maintain your principal office and place
			(b) not subject to examination by the s	state securities autl	hority of the state where you	maintain your principal office and place of business;
			Click HERE for a list of states in whice authority.	ch an investment ad	lviser, if registered, would not	be subject to examination by the state securities
		(3)	Reserved			
Ε		(4)	have your principal office and place of bu	usiness outside the	United States;	
5	7	(5)	are an investment adviser (or subadv	viser) to an investi	ment company registered ur	nder the Investment Company Act of 1940;
Г		(6)		•		ppment company pursuant to section 54 of the at least \$25 million of regulatory assets under
D		(7)		to assets of plans	having an aggregate value of	of at least \$200,000,000 that qualifies for the exemption
Г		(8)		, ,	•	ommon <i>control</i> with, an investment adviser that is he registered adviser;

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

	(9) are an adviser relying on rul	e 203A-2(c) because you expect to be	e eligible for SEC registration within	120 days;
	If you check this box, complet	e Section 2.A.(9) of Schedule D.		
	(10) are a multi-state adviser that	at is required to register in 15 or more	e states and is relying on rule 203A-2(c);
	If you check this box, complet	e Section 2.A.(10) of Schedule D.		
	(11) are an Internet adviser rely	ina on rule 203A-2(e);		
	•	exempting you from the prohibition a	gainst registration with the SEC.	
			gamst registration with the 320,	
_		e Section 2.A. (12) of Schedule D.		
	(13) are no longer eligible to rem	nain registered with the SEC.		
C. Und file of r like add to t	der state laws, SEC-registered adviwith the SEC. These are called <i>noti</i> eports and any amendments they for to receive notice of this and all substitutional state(s), check the box(es)	sers may be required to provide to statice filings. In addition, exempt reporting file with the SEC. If this is an initial approsequent filings or reports you submit next to the state(s) that you would like your registration to stop your notice file.	ate securities authorities a copy of the Foundation and the securities authorities a copy of the Foundation or report, check the box(es) of the SEC. If this is an amendment to the receive notice of this and all subs	tate securities authorities with a copy next to the state(s) that you would direct your notice filings or reports to equent filings or reports you submit
	AL	☑ IL	□ NE	□ _{SC}
	AK	□ IN	□ NV	
	AZ		□ NH	□ TN
	AR	□ KS	□ NJ	™ TX
	CA	□ KY	□ NM	□ UT
	co	□ LA	□ NY	□ Vī
	СТ	□ ME	□ NC	□ VI
	DE	□ MD	□ ND	□ VA
	DC	□ MA	□ он	□ wa
	FL	□ MI	□ ок	□ wv
	GA	□ MN	□ OR	□ WI
	GU	☐ MS	□ PA	□ wy
	HI	□ MO	□ PR	
	ID	□ MT	□ RI	
If y	ou are amending your registration to	stop your notice filings or reports from grant the coming year, your amendment mus		, ,
SECTION	J 2 A (8) Palatad Advisar			
If you ar with an		203A-2(b) from the prohibition on regied with the SEC and your <i>principal office</i>	-	•
Name of	Registered Investment Adviser			
CRD Nur	mber of Registered Investment Adv	iser		
SEC Nur	mber of Registered Investment Adv	iser		
SECTION	J 2.A.(9) Investment Adviser Exp	ecting to be Eligible for Commission	Registration within 120 Days	
If you ar within 1 deemed I am regis	re relying on rule 203A-2(c), the ex 20 days, you are required to make to have made the required represo not registered or required to be re ter with the SEC within 120 days a	emption from the prohibition on registrations about your eligentations. You must make both of the gistered with the SEC or a state securifier the date my registration with the	ration available to an adviser that expension available to an adviser that expension and the second securities authority and I have a reasonable SEC becomes effective.	expectation that I will be eligible to
I und	dertake to withdraw from SEC regis	tration if, on the 120th day after my re	egistration with the SEC becomes effec	tive, I would be prohibited by Section

203A(a) of the Advisers Act from registering with the SEC.

SEC	TION 2.A.(10) Multi-State Adviser	
_	ou are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations out your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.	
lf y	ou 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 v	ou are submitting your <i>annual updating amendment</i> , 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.	
SEC	TION 2.A.(12) SEC Exemptive <i>Order</i>	
	ou are relying upon an SEC <i>order</i> exempting you from the prohibition on registration, provide the following information:	
App	olication Number:	
803		
Dat	e of <i>order</i> :	
	n 3 Form of Organization but are filing an umbrella registration, the information in Item 3 should be provided for the filing adviser only.	
н ус А.	How are you organized?	_
	C Corporation	
	O Sole Proprietorship	
	C Limited Liability Partnership (LLP)	
	- Death and his	
	O Partnership	
	C Limited Partnership (LP)	
	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.	
Iter	n 4 Successions	
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.
- B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?
 - (2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?
 - (3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?
 - (4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?
 - (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
 - (6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?

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

Clients

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

- C. (1) To approximately how many *clients* for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?
 - (2) Approximately what percentage of your *clients* are non-*United States persons*? 38%
- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

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

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

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

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

Type of <i>Client</i>	(1) Number of Client(s)	(2) Fewer than 5 <i>Clients</i>	(3) Amount of Regulatory Assets under Management	
(a) Individuals (other than high net worth individuals)	0		\$ O	

	(b) High net worth individuals	0		\$ O
	(c) Banking or thrift institutions		P	\$ 24,210,734
	(d) Investment companies	6		\$ 1,223,259,343
	(e) Business development companies	0		\$ O
	(f) Pooled investment vehicles (other than investment companies and business development companies)	35		\$ 10,905,307,563
	(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	10		\$ 6,389,846,115
	(h) Charitable organizations		P	\$ 227,164,415
	(i) State or municipal <i>government entities</i> (including government pension plans)	6		\$ 1,209,752,300
	(j) Other investment advisers	0		\$ O
	(k) Insurance companies		P	\$ 119,957,545
	(I) Sovereign wealth funds and foreign official institutions		F	\$ 84,745,774
	(m) Corporations or other businesses not listed above	0	V	\$ 14,864,084
	(n) Other:	0		\$ O
E.	You are compensated for your investment advisory services by (check all the variation of the compensated for your investment advisory services by (check all the variation of the compensated for your management (2) Hourly charges (3) Subscription fees (for a newsletter or periodical) (4) Fixed fees (other than subscription fees) (5) Commissions (6) Performance-based fees (7) Other (specify):	at apply):		
	n 5 Information About Your Advisory Business - Regulatory Assets Under gulatory Assets Under Management	Management		
Reg	guiatory Assets officer Management			Yes No
F.	(1) Do you provide continuous and regular supervisory or management ser	vices to securities	portfolios?	• O
	(2) If yes, what is the amount of your regulatory assets under managemen			8 0
	U.S. Dollar Amount	it and total numbe		ber of Accounts
	Discretionary: (a) \$ 20,199,107,873		(d) 65	ber of Accounts
	Non-Discretionary: (a) \$20,177,107,073		(e) 0	
	Non-Discretionary. (b) \$ 0		(e) 0	
	Total: (c) \$ 20 100 107 972		(f) 6 E	
	Total: (c) \$ 20,199,107,873		(f) 65	
	Total: (c) \$ 20,199,107,873 Part 1A Instruction 5.b. explains how to calculate your regulatory assets to completing this Item.	under management		ese instructions carefully when
	Part 1A Instruction 5.b. explains how to calculate your regulatory assets to		t. You must follow th	
	Part 1A Instruction 5.b. explains how to calculate your regulatory assets a completing this Item. (3) What is the approximate amount of your total regulatory assets under the completing this in the approximate amount of your total regulatory assets under the completing this interest is a second to the completing this interest i		t. You must follow th	
Itom	Part 1A Instruction 5.b. explains how to calculate your regulatory assets of completing this Item. (3) What is the approximate amount of your total regulatory assets under a are non-United States persons? \$ 11,448,703,415		t. You must follow th	
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Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets of completing this Item. (3) What is the approximate amount of your total regulatory assets under a are non-United States persons? \$ 11,448,703,415 In 5 Information About Your Advisory Business - Advisory Activities Visory Activities		t. You must follow th	
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Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets a completing this Item. (3) What is the approximate amount of your total regulatory assets under a are non-United States persons? \$ 11,448,703,415 • 5 Information About Your Advisory Business - Advisory Activities visory Activities What type(s) of advisory services do you provide? Check all that apply. □ (1) Financial planning services □ (2) Portfolio management for individuals and/or small businesses □ (3) Portfolio management for investment companies (as well as "businesses")	management (repo	erted in Item 5.F.(2)	(c) above) attributable to <i>clients</i> who
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Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets a completing this Item. (3) What is the approximate amount of your total regulatory assets under a are non-United States persons? \$ 11,448,703,415 • 5 Information About Your Advisory Business - Advisory Activities visory Activities What type(s) of advisory services do you provide? Check all that apply. □ (1) Financial planning services □ (2) Portfolio management for individuals and/or small businesses □ (3) Portfolio management for investment companies (as well as "bus section 54 of the Investment Company Act of 1940) ■ (4) Portfolio management for pooled investment vehicles (other than	management (repo	er. You must follow the ported in Item 5.F.(2) at companies that heanies)	(c) above) attributable to <i>clients</i> who
Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets a completing this Item. (3) What is the approximate amount of your total regulatory assets under a are non-United States persons? \$ 11,448,703,415 In 5 Information About Your Advisory Business - Advisory Activities Visory Activities What type(s) of advisory services do you provide? Check all that apply. □ (1) Financial planning services □ (2) Portfolio management for individuals and/or small businesses □ (3) Portfolio management for investment companies (as well as "bus section 54 of the Investment Company Act of 1940)	management (repo	er. You must follow the ported in Item 5.F.(2) at companies that heanies)	(c) above) attributable to <i>clients</i> who
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Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets of completing this Item. (3) What is the approximate amount of your total regulatory assets under the are non-United States persons? \$ 11,448,703,415 • 5 Information About Your Advisory Business - Advisory Activities **Instruction About Your Advisory	management (repo	er. You must follow the ported in Item 5.F.(2) at companies that heanies)	(c) above) attributable to <i>clients</i> who
Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets of completing this Item. (3) What is the approximate amount of your total regulatory assets under reare non-United States persons? \$ 11,448,703,415 • 5 Information About Your Advisory Business - Advisory Activities **Instruction About Your Advisory Bu	management (repo	er. You must follow the ported in Item 5.F.(2) at companies that heanies)	(c) above) attributable to <i>clients</i> who
Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets of completing this Item. (3) What is the approximate amount of your total regulatory assets under are non-United States persons? \$ 11,448,703,415 (5) Information About Your Advisory Business - Advisory Activities (8) What type(s) of advisory services do you provide? Check all that apply. (9) Portfolio management for individuals and/or small businesses (9) Financial planning services (1) Financial planning services (2) Portfolio management for individuals and/or small businesses (3) Portfolio management for investment companies (as well as "businesses of the Investment Company Act of 1940) (4) Portfolio management for pooled investment vehicles (other than small businesses of the pooled investment vehicles) (5) Portfolio management for businesses (other than small businesses of the 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	management (repo	er. You must follow the ported in Item 5.F.(2) at companies that heanies)	(c) above) attributable to <i>clients</i> who
Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets of completing this Item. (3) What is the approximate amount of your total regulatory assets under are non-United States persons? \$ 11,448,703,415 15 Information About Your Advisory Business - Advisory Activities Visory Activities What type(s) of advisory services do you provide? Check all that apply. (1) Financial planning services (2) Portfolio management for individuals and/or small businesses (3) Portfolio management for investment companies (as well as "bus section 54 of the Investment Company Act of 1940) (4) Portfolio management for pooled investment vehicles (other than sometimes of the pooled investment vehicles) (5) Portfolio management for businesses (other than small businesses 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	management (repo	er. You must follow the ported in Item 5.F.(2) at companies that heanies)	(c) above) attributable to <i>clients</i> who
Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets of completing this Item. (3) What is the approximate amount of your total regulatory assets under reare non-United States persons? \$ 11,448,703,415 15 Information About Your Advisory Business - Advisory Activities What type(s) of advisory services do you provide? Check all that apply. (1) Financial planning services (2) Portfolio management for individuals and/or small businesses (3) Portfolio management for investment companies (as well as "businesses of the Investment Company Act of 1940) (4) Portfolio management for pooled investment vehicles (other than small businesses other pooled investment vehicles) (5) Portfolio management for businesses (other than small businesses 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	management (repo	er. You must follow the ported in Item 5.F.(2) at companies that heanies)	(c) above) attributable to <i>clients</i> who
Adv	Part 1A Instruction 5.b. explains how to calculate your regulatory assets of completing this Item. (3) What is the approximate amount of your total regulatory assets under are non-United States persons? \$ 11,448,703,415 15 Information About Your Advisory Business - Advisory Activities Visory Activities What type(s) of advisory services do you provide? Check all that apply. (1) Financial planning services (2) Portfolio management for individuals and/or small businesses (3) Portfolio management for investment companies (as well as "bus section 54 of the Investment Company Act of 1940) (4) Portfolio management for pooled investment vehicles (other than sometimes of the pooled investment vehicles) (5) Portfolio management for businesses (other than small businesses 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	management (repo	er. You must follow the ported in Item 5.F.(2) at companies that heanies)	(c) above) attributable to <i>clients</i> who

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

	investment companies to which you provide advice in Section 5.6.(3) or Schedule D.		
H.	If you provide financial planning services, to how many <i>clients</i> did you provide these services during your last fiscal year? O 0 1 - 10 O 11 - 25 O 26 - 50 O 51 - 100 O 101 - 250 O 251 - 500 O More than 500 If more than 500, how many? (round to the nearest 500)		
	In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relat with those investors.	'ionshi _l)
l.	 (1) Do you participate in a wrap fee program? (2) If you participate in a wrap fee program, what is the amount of your regulatory assets under management attributable to acting as: (a) sponsor to a wrap fee program \$ 	Yes O	No ⊙
	(b) portfolio manager for a wrap fee program?\$(c) sponsor to and portfolio manager for the same wrap fee program?\$		
	If you report an amount in Item 5.1.(2)(c), do not report that amount in Item 5.1.(2)(a) or Item 5.1.(2)(b).		
	If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in Section 5.1.(2) of Sci If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered		
	wrap fee program, do not check Item 5.1.(1) or enter any amounts in response to Item 5.1.(2).		No.
J.	(1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments? (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	0	© ©
	regulatory assets under management?		
K.	Separately Managed Account <i>Clients</i>		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) (separately managed account <i>clients</i>)?	ves ⊙	No O
	If yes, complete Section 5.K.(1) of Schedule D.		
	(2) Do you engage in borrowing transactions on behalf of any of the separately managed account <i>clients</i> that you advise? If yes, complete Section 5.K.(2) of Schedule D.	0	•
	(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.	•	0
L.	Marketing Activities		
	(1) Do any of your <i>advertisements</i> include:	Yes	No
	(a) Performance results?	•	0
	(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	•	0

(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
(e) Third-party ratings?	•	0
(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of <i>testimonials</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	0	•
(3) Do any of your advertisements include hypothetical performance?	0	•
(4) Do any of your advertisements include predecessor performance?	0	•
SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies		
If you check Item 5.G.(3), what is the SEC file number (811 or 814 number) of each of the registered investment companies and business developmed 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 region investment company and business development company to which you act as an adviser.		∍d
SEC File Number 811 - 00560		
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.		
No Information Filed		
SEC File Number 811 - 07257		
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.		
No Information Filed		
SEC File Number 811 - 08236		
Provide the regulatory assets under management of all <i>parallel managed accounts</i> related to a registered investment company (or series thereof) or business development company that you advise.		
No Information Filed		
SEC File Number		

Provide the regulatory assets under management of all parallel managed accounts related to a registered investment company (or series thereof) or

811 - 21779

business development company that you advise.

SEC File Number 811 - 22781

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.

No Information Filed

SECTION 5.1.(2) Wrap Fee Programs

No Information Filed

SECTION 5.K.(1) Separately Managed Accounts

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

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

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

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

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

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

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

(b)	Asse	et Type	End of year
	(i)	Exchange-Traded Equity Securities	98 %
	(ii)	Non Exchange-Traded Equity Securities	0 %

(iii)	U.S. Government/Agency Bonds	0 %
(iv)	U.S. State and Local Bonds	0 %
(v)	Sovereign Bonds	0 %
(vi)	Investment Grade Corporate Bonds	0 %
(vii)	Non-Investment Grade Corporate Bonds	0 %
(viii)	Derivatives	0 %
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	1 %
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	0 %
(xi)	Cash and Cash Equivalents	1 %
(xii)	Other	0 %

Generally describe any assets included in "Other"

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

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

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

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

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

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

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

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

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

(i) Mid-Year

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

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

(ii) End of Year

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

		150% or more	\$	\$	%	%	%	%	%	%
--	--	--------------	----	----	---	---	---	---	---	---

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

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

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

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

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

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

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

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

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

Complete a separate Schedule D Section 5.K.(3) for ea	ch custodian that holds ten	percent or more of your	aggregate separately	managed account
regulatory assets under management.				

(a) Legal name of custodian:

THE BANK OF NEW YORK MELLON

(b) Primary business name of custodian:

THE BANK OF NEW YORK MELLON

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

City: State: Country: NEW YORK New York United States

NEW YORK New York United States

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

(e) If the custodian is a broker-dealer, provide its SEC registration number (if any)

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

HPFHU00Q28E4N0NFVK49

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? \$1,376,562,909

(a) Legal name of custodian:

THE NORTHERN TRUST COMPANY

(b) Primary business name of custodian:

THE NORTHERN TRUST COMPANY

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

City:State:Country:CHICAGOIllinoisUnited States

Yes No

Yes No

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

(e)		If the custodian is a broker-dealer, provide its SEC registration number (if any)					
(f)	If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its <i>legal entity identifier</i> (if any)						
		6PTKHDJ8HDUF78PFV					
(g)		What amount of your \$ 1,452,264,996	regulatory assets under management attribut	able to separately managed accounts is held at the custodian?			
(a)		Legal name of custodi	an·				
(4)		STATE STREET BANK &					
(b)		Primary business nam STATE STREET BANK &					
(c)			custodian's office(s) responsible for <i>custody</i> of	the assets :			
		City:	State:	Country:			
		BOSTON	Massachusetts	United States			
(d)		Is the custodian a <i>rela</i>	nted person of your firm?		es No		
(e)			roker-dealer, provide its SEC registration numb		0 0		
(6)		-	oker-dealer, provide its SEC registration numb	er (ii arry)			
(f)		any)		s not have an SEC registration number, provide its legal entity identifier	(if		
(g)		571474TGEMMWANRL		able to separately managed accounts is held at the custodian?			
(9)		\$ 5,196,389,742	regulatory assets under management attribute	able to separately managed accounts is neighbor at the custodium.			
ten	า 6 Ot	her Business Activities					
			ion about your firm's other business activities.				
Α.	You a	are actively engaged in	business as a (check all that apply):				
	_	_	gistered or unregistered) entative of a broker-dealer				
		(3) commodity pool of	perator or commodity trading advisor (whether	registered or exempt from registration)			
	_	(4) futures commissio(5) real estate broker					
		(6) insurance broker	or agent	of a hank)			
		(7) bank (including a :(8) trust company	separately identifiable department or division c	त a bank)			
		(9) registered municip(10) registered securit					
		(10) registered security (11) major security-bas	•				
	_	(12) accountant or acco					
		(13) lawyer or law firm(14) other financial pro	duct salesperson (specify):				
	If you	u engage in other busine	ss using a name that is different from the names	s reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D.			
					es No		
B.	(1)		ed in any other business not listed in Item 6.A.		0 0		
	(2)		iness your primary business?		0 0		
		ir yes, describe this o	ner business on Section 6.B.(2) of Schedule D, a	and if you engage in this business under a different name, provide that nam Y	ne. Yes No		
	(3)	Do you sell products or	provide services other than investment advice		0 0		
		If "yes," describe this o	ther business on Section 6.B.(3) of Schedule D, &	and if you engage in this business under a different name, provide that nam	ne.		
SEC	TION	6.A. Names of Your Ot	her Businesses				

No Information Filed

SECTION 6.B.(2) Description of Primary Business						
Describe your primary business (not your investment advisory business):						
If you engage in that business under a different name, provide that name:						
SECTION 6.B.(3) Description of Other Products and Services						
Describe other products or services you sell to your <i>client</i> . You may omit products and services that you listed in Section 6.B.(2) above.						
If you engage in that business under a different name, provide that name:						
Item 7 Financial Industry Affiliations						
In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your <i>clients</i> .						
A. This part of Item 7 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates. Your <i>related persons</i> are all of your <i>advisory affiliates</i> and any <i>person</i> that is under common <i>control</i> with you.						
You have a <i>related person</i> that is a (check all that apply): [(1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)						
 (2) other investment adviser (including financial planners) (3) registered municipal advisor 						
 (4) registered security-based swap dealer (5) major security-based swap participant 						
(6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)						
(7) futures commission merchant						
 □ (8) banking or thrift institution □ (9) trust company 						
[(10) accountant or accounting firm						
☐ (11) lawyer or law firm ☐ (12) insurance company or agency						
(12) misdratice company or agency (13) pension consultant						
(14) real estate broker or dealer						
 (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles 						
Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).						
Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.						
For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.						
You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.						
You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.						
SECTION 7.A. Financial Industry Affiliations						
No Information Filed						
Item 7 Private Fund Penarting						
Item 7 Private Fund Reporting Yes No						
B. Are you an adviser to any private fund?						
If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must,						

instead, complete Section 7.B.(2) of Schedule D.

the feeder funds answer the following questions:

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

	Funds per Page: 15 Total Funds: 10		
A. P	PRIVATE FUND		
Info	ormation About the <i>Private Fund</i>		
1.	(a) Name of the <i>private fund</i> :		
	AXIOM GLOBAL SMALL/MICRO-CAP OPPORTUNITY FUND, L.P.		
	(b) Private fund identification number:		
	(include the "805-" prefix also)		
	805-1483550289		
2.	Under the laws of what state or country is the <i>private fund</i> organized:		
۷.	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		
	AXIOM INVESTORS LLC		
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 19 □ (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 19 		
5.	List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
	No Information Filed		
4	(a) Is this a "master fund" in a master-feeder arrangement?	Yes	_
6.	(b) If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?	0	•
	No Information Filed		
	(c) Is this a "feeder fund" in a master-feeder arrangement?	Yes	No •
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests?	0	٠
	Name of private fund:		
	Private fund identification number:		
	Private fund identification number:	ction 7.B.((1)

No Information Filed

	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	\odot
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investmen vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	t	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	0
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the <i>private fund</i> ?		
	• hedge fund • liquidity fund • private equity fund • real estate fund • securitized asset fund • venture capital fund • Other private of the	ate fui	าd:
	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> : \$ 20,422,839		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 2,000,000		
	NOTE: Report the amount routinely required of investors who are not your related persons (even if different from the amount set forth in the organizational documents of the fund).	e	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 25		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 47%		
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	No O
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
<u>You</u>	ur Advisory Services		
17	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	
17.	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer question 17.(a) is "no," leave this question blank.	r to	•
	No Information Filed		
	<u> </u>	Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank.		
	No Information Filed		
		Yes	No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	•	0

NOTE: For purposes of this question, do not consider feeder funds of the private fund.

	0%		
<u>Pri</u>	vate Offering	V	
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?	yes ⊙	No O
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-100558		
B. S	ERVICE PROVIDERS		
Aud	<u>ditors</u>	Yes	s 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 than one aud you must complete questions (b) through (f) separately for each auditing firm.	iting firn	Λ,
	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: DELOITTE & TOUCHE LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country:		
	CHICAGO Illinois United States		
	(d) Is the auditing firm an independent public accountant?	Yes I	No C
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 34		
	(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
		Yes	s No
	(g) Are the <i>private fund's</i> audited financial statements for the most recently completed fiscal year distributed to the <i>private fund's</i> investors?	•	
	(h) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified	d opinion	ıs?
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the repor	t is avail	able.
<u>Pri</u>	me Broker		
		Yes	s No
24.	(a) Does the <i>private fund</i> use one or more prime brokers?	•	0
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If <i>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	the <i>priv</i>	ate ——
	Additional Prime Broker Information : 1 Record(s) Filed.		
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. <i>private fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	If the	

20. Approximately what percentage of your $\emph{clients}$ has invested in the $\emph{private fund}$?

UBS SECURITIES LLC			
(c) If the prime broker is register	red with the SEC, its registration r	number:	
8 - 22651			
CRD Number (if any): 7654			
(d) Location of prime broker's offi	ice used principally by the <i>private</i>	fund (city, state and country):	
City:	State:	Country:	
NEW YORK	New York	United States	Yes M
(e) Does this prime broker act as	custodian for some or all of the p	private fund's assets?	• •
dian			Yes
) Does the <i>private fund</i> use any custo	dians (including the prime broker	rs listed above) to hold some or all of its assets?	•
•		hrough (g) below for each custodian the <i>private i</i>	
fund uses more than one custodian,	you must complete questions (b) through (g) separately for each custodian.	
Additional Custodian Information	: 1 Record(s) Filed.		
(b) Legal name of custodian: UBS SECURITIES LLC			
(c) Primary business name of cus	stodian:		
(d) The location of the custodian'	s office responsible for <i>custody</i> o	f the <i>private fund's</i> assets (city, state and country	/):
City:	State:	Country:	
NEW YORK	New York	United States	
	.		Yes I
(e) Is the custodian a related pers	son of your firm?		0
(f) If the custodian is a broker-de	ealer, provide its SEC registration	number (if any):	
8 - 22651			
CRD Number (if any):			
7654			
(g) If the custodian is not a broke identifier (if any)	er-dealer, or is a broker-dealer bu	ut does not have an SEC registration number, pr	ovide its <i>legal entity</i>
<u>nistrator</u>			Yes
a) Does the <i>private fund</i> use an admini	strator other than your firm?		•
If the answer to question 26.(a) is 'must complete questions (b) throug		nrough (f) below. If the <i>private fund</i> uses more the trator.	nan one administrator, y
Additional Administrator Informa	tion : 1 Record(s) Filed.		

 $administrator,\ you\ must\ complete\ questions\ (b)\ through\ (f)\ separately\ for\ each\ administrator.$

(b) Name of administrator:

NORTHERN TRUST HEDGE FUND SERVICES LLC

(b) Name of the prime broker:

	(c) Location of administra	ator (city, state and country):		
	City:	State:	Country:	
	CHICAGO	Illinois	United States	
	(d) Is the administrator a	a related person of your firm?		Yes No ○ ⊙
	(e) Does the administrat	or prepare and send investor acco	ount statements to the <i>private fund's</i> investors?	
		•	some but not all investors) ONO (provided to no inves	itors)
			to the (rest of the) private fund's investors, respond "n	
27.	During your last fiscal year, who your <i>related person</i> ?	at percentage of the <i>private fund's</i>	s assets (by value) was valued by a <i>person</i> , such as an	administrator, that is not
	Include only those assets where	luation used for purposes of inves	valuation procedure established for that asset, if any, in stor subscriptions, redemptions or distributions, and fee	9 9
Maı	rketers			V. a. Na
28	(a) Does the <i>private fund</i> use th	ne services of someone other than	n you or your <i>employees</i> for marketing purposes?	Yes No
20.	You must answer "yes" who similar <i>person</i> . If the answer	ether the <i>person</i> acts as a placem r to question 28.(a) is "yes," resp	ent agent, consultant, finder, introducer, municipal advisond to questions (b) through (g) below for each such nust complete questions (b) through (g) separately for e	narketer the <i>private fund</i>
	uses. If the <i>private fund</i> use	s more than one marketer you me	ust complete questions (b) through (g) separately for e	acri mai ketei .
			No Information Filed	
1 nfo	(a) Name of the <i>private fund</i> : AXIOM INTERNATIONAL OPF (b) <i>Private fund</i> identification nu (include the "805-" prefix at 805-8085218326	PORTUNITY FUND, L.P.		
2.	Under the laws of what state or State:	country is the <i>private fund</i> organ	ized: ntry:	
	Delaware		ted 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, Mar AXIOM INVESTORS LLC	nager, Trustee, or Director		
	(b) If filing an umbrella registrat		or <i>relying adviser(s)</i> that sponsor(s) or manage(s) this <i>p</i> No Information Filed	private fund.
4.	(1) qualifies for the exclusion		e): at company under section 3(c)(1) of the Investment Com at company under section 3(c)(7) of the Investment Com	. ,
5.	List the name and country, in E	nglish, of each <i>foreign financial reg</i>	gulatory authority with which the private fund is registere	d.
		N	No Information Filed	
				Yes No

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

	No Information Filed	
		Yes No
	(c) Is this a "feeder fund" in a master-feeder arrangement?	0 0
	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :	
	Private fund identification number: (include the "805-" prefix also)	
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section for the master-feeder arrangement or reporting on the funds separately.	7.B.(1)
	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions:	r each o
	No Information Filed	
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it	
	multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	Yes No
	(a) Is this private fund a "fund of funds"?	0 6
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0 0
	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	Yes No
) .	What type of fund is the <i>private fund</i> ?	
	• hedge fund • liquidity fund • private equity fund • real estate fund • securitized asset fund • venture capital fund • Other private equity	te fund:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	
1.	Current gross asset value of the <i>private fund</i> : \$ 157,598,046	
w	nership	
2.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 2,000,000	
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).)
١.	Approximate number of the <i>private fund's</i> beneficial owners: 51	
	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 27%	
	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 1%	
	(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 No

16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 1%		
<u> Υοι</u>	ur Advisory Services		
		Yes	s No
17.	(a) Are you a subadviser to this <i>private fund</i> ?	0	\odot
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the a question 17.(a) is "no," leave this question blank.	inswer to	
	No Information Filed		
		Yes	s No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	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 fund</i> . to question 18.(a) is "no," leave this question blank.	If the answ	wer
	No Information Filed		
		Yes	s No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	•	0
	NOTE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
Desir	trata Offering		
PIT	ivate Offering	Yes	s 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 021-128533		
Aud	<u>ditors</u>	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?	•	0
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one a you must complete questions (b) through (f) separately for each auditing firm.	uditing firr	m,
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than on auditing firm, you must complete questions (b) through (f) separately for each auditing firm.	9	
	(b) Name of the auditing firm:		
	DELOITTE & TOUCHE LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country: CHICAGO Illinois United States		
		Yes	No
	(d) Is the auditing firm an independent public accountant?	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 34		
	(f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board is accordance with its rules?	n o	0

				103 140
(g)	Are the <i>private fund's</i> audited finan investors?	cial statements for the most recei	ntly completed fiscal year distributed to the private fund's	⊙ ○
(h)	Do all of the reports prepared by the	ne auditing firm for the private fur	nd since your last <i>annual updating amendment</i> contain unqualifi	ed opinions?
	⊙ Yes O No O Report Not Yet Re	eceived		
	If you check "Report Not Yet Receive	ed," you must promptly file an ame	ndment to your Form ADV to update your response when the rep	ort is available.
rime	<u>Broker</u>			
				Yes No
4. (a)	Does the <i>private fund</i> use one or m	·		⊙ ○
	•		hrough (e) below for each prime broker the <i>private fund</i> uses. s (b) through (e) separately for each prime broker.	if the <i>private</i>
	Additional Prime Broker Informa	ition: 1 Record(s) Filed.		
	•) through (e) below for each prime broker the <i>private fund</i> use questions (b) through (e) separately for each prime broker.	s. If the
	(b) Name of the prime broker: UBS SECURITIES LLC			
	(c) If the prime broker is registe 8 - 22651	ered with the SEC, its registration	number:	
	CRD Number (if any): 7654			
	(d) Location of prime broker's of	fice used principally by the <i>private</i>	e fund (city, state and country):	
	City:	State:	Country:	
	NEW YORK	New York	United States	Yes No
	(e) Does this prime broker act as	s custodian for some or all of the	private fund's assets?	© 0
ustod	<u>ian</u>			Voc Nr
5. (a)	Does the <i>private fund</i> use any custo	odians (including the prime broke	rs listed above) to hold some or all of its assets?	Yes No
o. (a)	If the answer to question 25.(a) is	"yes," respond to questions (b) t	hrough (g) below for each custodian the <i>private fund</i> uses. If to through (g) separately for each custodian.	~ ~
			through (g) separately for each custodian.	
	Additional Custodian Information	າ : 1 Record(s) Filed.		
	•) through g) below for each custodian the <i>private fund</i> uses. If (b) through (g) separately for each custodian.	the <i>private</i>
	(b) Legal name of custodian: UBS SECURITIES LLC			
	(c) Primary business name of cu UBS SECURITIES LLC	stodian:		
	(d) The location of the custodian	's office responsible for <i>custody</i> c	of the private fund's assets (city, state and country):	
	City:	State:	Country:	
	NEW YORK	New York	United States	Yes No
	(e) Is the custodian a related pe	rson of your firm?		0 0
	(f) If the custodian is a broker-c 8 - 22651	dealer, provide its SEC registration	n number (if any):	
	CRD Number (if any): 7654			

·	an administrator other than your firm? 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one adminis	Yes Notes trator, you
must complete questions (I	b) through (f) separately for each admi	•	
Additional Administrator	Thiormation : T Record(s) Flied.		
· ·	n 26.(a) is "yes," respond to questions complete questions (b) through (f) sep	(b) through (f) below. If the <i>private fund</i> uses more than one arately for each administrator.	
(b) Name of administrate	or:		
NORTHERN TRUST HE	EDGE FUND SERVICES LLC		
(c) Location of administr	rator (city, state and country):		
City:	State:	Country:	
CHICAGO	Illinois	United States	
(d) Is the administrator	a related person of your firm?		Yes No
(d) is the administrator	a related person of your firm?		0 0
		statements to the <i>private fund's</i> investors? but not all investors) No (provided to no investors)	
		nds the investor account statements to the (rest of the) private fundate (rest of the) private fund's investors, respond "not applicable."	d's
investors? If investor	r account statements are not sent to the		
investors? If investoring your last fiscal year, what related person? 10% 10 lude only those assets wher	r account statements are not sent to the nat percentage of the private fund's associate (i) such person carried out the valual aluation used for purposes of investors	ne (rest of the) private fund's investors, respond "not applicable."	at is not any
investors? If investoring your last fiscal year, what related person? O'' lude only those assets wherevant quotes, and (ii) the variable.	r account statements are not sent to the nat percentage of the private fund's associate (i) such person carried out the valual aluation used for purposes of investors	tion procedure established for that asset, if any, including obtaining	at is not any
investors? If investoring your last fiscal year, what related person? O% lude only those assets wherevant quotes, and (ii) the valuation of the valuation of the control of the valuation of th	nat percentage of the <i>private fund's</i> associate (i) such <i>person</i> carried out the valual aluation used for purposes of investor sedetermined by such <i>person</i> .	tion procedure established for that asset, if any, including obtaining	at is not any Juding
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investors? If investor ring your last fiscal year, what related person? Oweder and (ii) the valuation of the private fund use the you must answer "yes" who similar person. If the answer	raccount statements are not sent to the raccount statements are not sent to the nat percentage of the private fund's associate (i) such person carried out the valua aluation used for purposes of investor statement and the services of someone other than you nether the person acts as a placement are to question 28.(a) is "yes," respondes more than one marketer you must one	ets (by value) was valued by a <i>person</i> , such as an administrator, the tion procedure established for that asset, if any, including obtaining ubscriptions, redemptions or distributions, and fee calculations (including obtaining or your <i>employees</i> for marketing purposes? In a gent, consultant, finder, introducer, municipal advisor or other solice to questions (b) through (g) below for each such marketer the <i>priva</i>	at is not any luding Yes No C ©
investors? If investor ring your last fiscal year, what related person? """ """ """ """ """ """ """ """ """	raccount statements are not sent to the raccount statements are not sent to the nat percentage of the private fund's associate (i) such person carried out the valua aluation used for purposes of investor statement and the services of someone other than you nether the person acts as a placement are to question 28.(a) is "yes," respondes more than one marketer you must one	ets (frest of the) private fund's investors, respond "not applicable." ets (by value) was valued by a person, such as an administrator, the sion procedure established for that asset, if any, including obtaining ubscriptions, redemptions or distributions, and fee calculations (including obtaining ubscriptions, redemptions or distributions, and fee calculations (including obtaining ubscriptions, redemptions or distributions, and fee calculations (including obtaining ubscriptions, redemptions or distributions, and fee calculations (including obtaining ubscriptions, redemptions or distributions, and fee calculations (including obtaining ubscriptions, redemptions or distributions, and fee calculations (including obtaining ubscriptions).	at is not any luding Yes No C ©
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(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)

(include the "805-" prefix also)

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

805-1838524932

(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? No Information Filed Yee (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 filling a single Schedule D. Section 7.B. If you are filling a single Schedule D. Section 7.B. (1) for a master-feeder arrangement according to the instructions to this Section 7.B. (1), for eather feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Yee (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in lunds managed by you or by a related person?	A			
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) or the investment Company Act of 1940 (2) qualifies fer the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 (3) Is this a "master fund" in a master-feeder arrangement? (4) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund? (5) If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? No Information Filed You (6) Is this a "feeder fund" in a master-feeder arrangement? (7) 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 in a master-feeder arrangement? (8) 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 in a master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.8 for the master-feeder arrangement or reporting on the funds separately. If you use filing a single Schedule D, Section 7.8 (1) for a master-feeder arrangement according to the instructions to this Section 7.8 (1), for an asset fund in the instructions to this Section 7.8 (1), for an asset feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of assets in a single master than the funds assets in a single master than the funds assets in a single master than the proposes of this question of it is say to be private fund in a single master than the proposes of this question of it is say of the purposes of this question of it is say of the purposes of this questio		KIOM INVESTORS LLC		
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) or 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 (3) Is this a "master fund" in a master-feeder arrangement? (4) Is this a "master fund" in a master-feeder arrangement? (5) It yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund? (6) It yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? No information Filed Ye (6) Is this a "feeder fund" in a master-feeder arrangement? (7) 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 7.8 for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.8 (1) for a master-feeder arrangement according to the instructions to this Section 7.8 (1), for a feeder fund in a master fund in which 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 assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund") invest in section if it issumation if it issumation for a section of which is assets in a single master fund. 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 venicles, regardless of whether they are also private funds or registered investment companies.	(h)	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund		
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)(1) of the Investment Company Act of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 (3) Is this a "master fund" in a master-recoder arrangement? (4) It yos, what is the name and private fund identification number (if any) of the fooder funds investing in this private fund? (5) It yos, what is the name and private fund identification number (if any) of the master fund in which this private fund invests? (6) It yos, 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. (6) It yos, 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. (7) Private fund identification number: (Include the "805-" priefly also) (8) If you must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.8 (1) for a master-feeder arrangement according to the instructions to this Section 7.8 (1), for each to recoder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of asserts in a single fund ("master fund") invest all or substantially all of asserts in a single fund ("master fund") invest all or substantially all of asserts in a single fund of funds"? No Information Filed				
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List the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. No Information Filed Ye (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? No Information Filed Ye (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 filling a single Schedule D. Section 7.B for the master-feeder arrangement according to the instructions to this Section 7.B (1), for each feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement according to the instructions to this Section 7.B (1), for each feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issue multiple classes (or series) of shares or intorests, and each class (or series) invests substantially all of its assets in a single master fund. Ye (a) Is this private fund a "fund of funds"? No Information Filed No Information Filed in Information Filed No Information Filed No Information Filed No Information Filed in Information Filed in Information Filed No Information Filed in Information Filed No Information File	Th	e private fund (check all that apply; you must check at least one):		
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(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 Ye (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 filling a single Schedule D, Section 7.B. If you are filling 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 feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" to purposes of this question if it issumultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Ye (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person?			Yes	Nc
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(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 filling a single Schedule D, Section 7.B. If you are filling a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for ea the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issumultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Ye (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person?	(c)		res	O
NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filling a single Schedule D, Section 7.B for the master-feeder arrangement or reporting on the funds separately. If you are filling 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 feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issumultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Ye (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person?	` ,			٠
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for the master-feeder arrangement or reporting on the funds separately. If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for ear the feeder funds answer the following questions: No Information Filed NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issumultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Ye (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person?				
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assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issumultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Ye (a) Is this private fund a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies. (b) If yes, does the private fund invest in funds managed by you or by a related person?	-	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	eac	
(a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	-	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 e feeder funds answer the following questions:	eac	
NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	NO ass	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 a feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is	of th	h of
vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	NO ass	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 a feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is all tiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	of th ssue Yes	neir ed
	NC ass mu	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 a feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is all tiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Is this private fund a "fund of funds"?	of th	neir ed
Ye	NC ass mu	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 a feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is ultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. O Is this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment	of th ssue Yes	neir ed
Ye	NC ass mu (a)	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 e feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is all tiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. O Is this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment hicles, regardless of whether they are also private funds or registered investment companies.	of th ssue Yes	neir ed No
	NC ass mu (a)	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 e feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is all tiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. O Is this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment hicles, regardless of whether they are also private funds or registered investment companies.	of th	neir ed 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.)?	NC ass mu (a)	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 a feeder funds answer the following questions: No Information Filed TE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is ultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Is this private fund a "fund of funds"? TE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment hicles, regardless of whether they are also private funds or registered investment companies. If yes, does the private fund invest in funds managed by you or by a related person?	of th	neir ed No
What type of fund is the <i>private fund</i> ?	NC ass mu (a) NC vel (b)	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 a feeder funds answer the following questions: No Information Filed DTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is ultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Is this private fund a "fund of funds"? DTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment hicles, regardless of whether they are also private funds or registered investment companies. If yes, does the private fund invest in funds managed by you or by a related person? It yes, does the private fund invest in securities issued by investment companies registered under the Investment	of the session of the	neir ed No
• hedge fund • liquidity fund • private equity fund • real estate fund • securitized asset fund • venture capital fund • Other private fund	NC ass mu (a) NC vel (b)	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 a feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is utiliple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Is this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment hicles, regardless of whether they are also private funds or registered investment companies. If yes, does the private fund invest in funds managed by you or by a related person? If yes, does the private fund invest in funds managed by you or by a related person?	of the same of the	neir ed No
NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.	NC ass mu (a) NC vel (b) Du Co	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 a feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is ultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Is this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment hicles, regardless of whether they are also private funds or registered investment companies. If yes, does the private fund invest in funds managed by you or by a related person? In your last fiscal year, did the private fund invest in securities issued by investment companies registered under the Investment impany Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	of the session of the	neir ed No No No O
Current gross asset value of the private fund:	NC ass mu (a) NC vel (b) Du Co	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 a feeder funds answer the following questions: No Information Filed OTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all sets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is ultiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund. Its this private fund a "fund of funds"? OTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment hicles, regardless of whether they are also private funds or registered investment companies. If yes, does the private fund invest in funds managed by you or by a related person? Furing your last fiscal year, did the private fund invest in securities issued by Investment companies registered under the Investment impany Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)? The private fund is the private fund? The private fund is the private fund? The private fund is private fund? The private fund is private fund? The private fund is private fund?	of the session of the	neir ed No No No O

Country: United States

State:

\$ 71,455,673

Delaware

Ow	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 2,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 51		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 37%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 1%		
	(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	
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 1%		
You	ur Advisory Services		
17	(a) Are you a subadviser to this <i>private fund</i> ?	Yes	
17.	(a) Are you a subadviser to this <i>private rund</i>?(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i>. If the answer question 17.(a) is "no," leave this question blank.	_	•
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	\circ	•
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the ato question 18.(a) is "no," leave this question blank.	answ	er —
	No Information Filed		
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ?	Yes	_
. , .	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> ?		
<u>Pri</u>	vate Offering		
		Yes	No
21.	Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	0
22.	If yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-69575		
D C			
В. 5	ERVICE PROVIDERS		
Au	<u>ditors</u>	Yes	Ne
23.	(a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit?	res ©	INC
	(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 than one auditing you must complete questions (b) through (f) separately for each auditing firm.		
	Additional Auditor Information : 1 Record(s) Filed.		

If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one

a	uditing firm, you must compl	ete questions (b) through (f) separ	ately for each auditing firm.		
(o) Name of the auditing firm:				
	DELOTTE & TOUCHE LLP				
(c) The location of the auditing	g firm's office responsible for the p	rivate fund's audit (city, state and country):		
	City:	State:	Country:		
	CHICAGO	Illinois	United States	Yes	Nο
	d) Is the auditing firm an <i>ind</i>	ependent public accountant?			0
(e) Is the auditing firm regist	ered with the Public Company Acco	unting Oversight Board?	•	0
	If yes, Public Company Ac	counting Oversight Board-Assigned	Number:		
(f) If "yes" to (e) above, is the accordance with its rules?		nspection by the Public Company Accounting Oversight Board in	•	0
				Yes	s ľ
_	the <i>private fund's</i> audited firestors?	nancial statements for the most rec	ently completed fiscal year distributed to the <i>private fund's</i>	•	•
(h) Do	all of the reports prepared by	y the auditing firm for the private fu	and since your last annual updating amendment contain unqualif	ied opinior	าร?
•	Yes O No O Report Not Yet	Received			
If y	ou check "Report Not Yet Rece	eived," you must promptly file an am	endment to your Form ADV to update your response when the rep	oort is avail	labi
me Brok	<u>er</u>				_
(a) Do	os the private funduse one o	r mara prima brakars?		Ye	
	es the <i>private fund</i> use one or	·	through (e) below for each prime broker the <i>private fund</i> uses.		nt.
	•	•	ns (b) through (e) separately for each prime broker.	ii the priv	'ale
Ac	ditional Prime Broker Infor	mation : 1 Record(s) Filed.			
	·	•	b) through (e) below for each prime broker the <i>private fund</i> use e questions (b) through (e) separately for each prime broker.	es. If the	
(o) Name of the prime broker UBS SECURITIES LLC	:			
(c) If the prime broker is regi 8 - 22651	stered with the SEC, its registration	number:		
	CRD Number (if any): 7654				
	d) Location of prime broker's	office used principally by the priva	te fund (city, state and country):		
	City:	State:	Country:		
	NEW YORK	New York	United States	Yes	Nο
	e) Does this prime broker ac	t as custodian for some or all of the	e private fund's assets?		0
todian				Yes	s l
(a) Doe	es the <i>private fund</i> use anv cu	ustodians (including the prime brok	ers listed above) to hold some or all of its assets?	⊙	
	•		through (g) below for each custodian the <i>private fund</i> uses. If	~	
	•		(b) through (g) separately for each custodian.		

Additional Custodian Information : 1 Record(s) Filed.

	Legal name of custodian: UBS SECURITIES LLC			
(c)	Primary business name of cut UBS SECURITIES LLC	stodian:		
(d)	The location of the custodian	's office responsible for <i>custod</i> y	of the <i>private fund's</i> assets (city, state and country	v):
	City: NEW YORK	State: New York	Country: United States	
				Y
(e)	Is the custodian a related per	rson of your firm?		(
(f)		lealer, provide its SEC registrat	on number (if any):	
	8 - 22651			
	CRD Number (if any): 7654			
(g)	If the custodian is not a brok identifier (if any)	cer-dealer, or is a broker-dealer	but does not have an SEC registration number, pro	ovide its <i>legal entit</i> y
If the		"yes," respond to questions (b) gh (f) separately for each admi	through (f) below. If the <i>private fund</i> uses more th nistrator.	an one administra
Add If the	e answer to question 26.(a) is complete questions (b) throughtional Administrator Information answer to question 26.(a)	"yes," respond to questions (b) gh (f) separately for each admination: 1 Record(s) Filed.	b) through (f) below. If the <i>private fund</i> uses more	
Add If the	e answer to question 26.(a) is complete questions (b) throughtional Administrator Informational Administrator Information answer to question 26.(a) in ministrator, you must complete	"yes," respond to questions (b) gh (f) separately for each admination: 1 Record(s) Filed. is "yes," respond to questions (b) equestions (b) through (f) separately for each admination (f) through (f) separately for each admination (f) through (f) separately for each admination (f) sepa	b) through (f) below. If the <i>private fund</i> uses more	
Add If the must	e answer to question 26.(a) is complete questions (b) through the answer to question 26.(a) is the answer to question 26.(a) in ministrator, you must complete Name of administrator: NORTHERN TRUST HEDGE FUIL Complete C	"yes," respond to questions (b) gh (f) separately for each admination: 1 Record(s) Filed. is "yes," respond to questions to questions (b) through (f) separately for each admination: 1 Record(s) Filed.	b) through (f) below. If the <i>private fund</i> uses more	
Add If the must	e answer to question 26.(a) is complete questions (b) through the answer to question 26.(a) is the answer to question 26.(a) is the answer to question 26.(a) is the answer to question 26.(b) in the answer to question 26.(b) in the answer to question 26.(c) in the answer to question 26.(b) in the answer to question 26.(c) in the answer to question 26.(d) is complete answer to question 26	"yes," respond to questions (b) gh (f) separately for each admination: 1 Record(s) Filed. is "yes," respond to questions to questions (b) through (f) separately for each admination: 1 Record(s) Filed.	b) through (f) below. If the <i>private fund</i> uses more trately for each administrator. Country:	
Add If the must	e answer to question 26.(a) is complete questions (b) through the answer to question 26.(a) is the answer to question 26.(a) iministrator, you must complete Name of administrator: NORTHERN TRUST HEDGE FUIL Location of administrator (city	"yes," respond to questions (b) gh (f) separately for each admination: 1 Record(s) Filed. is "yes," respond to questions to e questions (b) through (f) separately for each admination in the property of the	b) through (f) below. If the <i>private fund</i> uses more trately for each administrator.	than one
Add If the must Add (b)	e answer to question 26.(a) is complete questions (b) through the answer to question 26.(a) is the answer to question 26.(a) is the answer to question 26.(a) is the answer to question 26.(b) in the answer to question 26.(b) in the answer to question 26.(c) in the answer to question 26.(b) in the answer to question 26.(c) in the answer to question 26.(d) is complete answer to question 26	"yes," respond to questions (b) gh (f) separately for each admination: 1 Record(s) Filed. is "yes," respond to questions to e questions (b) through (f) separately for each admination in the content of	b) through (f) below. If the <i>private fund</i> uses more trately for each administrator. Country:	than one
Add If the must Add (b) (c)	e answer to question 26.(a) is complete questions (b) through the answer to question 26.(a) is the answer to question 26.(a) is ministrator, you must complete Name of administrator: NORTHERN TRUST HEDGE FUIL Location of administrator (city City: CHICAGO Is the administrator a related Does the administrator prepare	"yes," respond to questions (b) gh (f) separately for each admination: 1 Record(s) Filed. is "yes," respond to questions to e questions (b) through (f) separately for each admination in the sequestion of the person of your firm? are and send investor account	b) through (f) below. If the <i>private fund</i> uses more trately for each administrator. Country: United States	than one
Add If the must Add (b) (c)	e answer to question 26.(a) is complete questions (b) through the answer to question 26.(a) is the answer to question 26.(a) is ministrator, you must complete Name of administrator: NORTHERN TRUST HEDGE FUIL Location of administrator (city City: CHICAGO Is the administrator a related Does the administrator prepare	"yes," respond to questions (b) gh (f) separately for each admination: 1 Record(s) Filed. is "yes," respond to questions to e questions (b) through (f) separately for each admination in the sequestion of the person of your firm? are and send investor account	b) through (f) below. If the <i>private fund</i> uses more trately for each administrator. Country: United States	than one Yes
Add If the must Add (b) (c)	e answer to question 26.(a) is complete questions (b) through the answer to question 26.(a) is the answer to question 26.(a) is ministrator, you must complete Name of administrator: NORTHERN TRUST HEDGE FUIL Location of administrator (city City: CHICAGO Is the administrator a related Does the administrator prepare Yes (provided to all investors).	"yes," respond to questions (b) gh (f) separately for each admination: 1 Record(s) Filed. is "yes," respond to questions to e questions (b) through (f) separately for each admination in the property of the	b) through (f) below. If the <i>private fund</i> uses more trately for each administrator. Country: United States	than one Yes O ors)

Marketers

allocations) was the valuation determined by such person.

Yes No

 \circ

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

	No Information Filed		
RIV	'ATE FUND		
<u>rm</u>	nation About the <i>Private Fund</i>		
(a	Name of the private fund:		
(b	AXIOM INVESTORS TRUST II (AXIOM CONCENTRATED GLOBAL GROWTH EQUITY FUND) Private fund identification number:		
•	(include the "805-" prefix also)		
	805-3162496940		
Ur	nder the laws of what state or country is the <i>private fund</i> organized:		
	State: Country:		
	Delaware United States		
(a	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):		
	lame of General Partner, Manager, Trustee, or Director XIOM INVESTORS LLC		
(b	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.		
	No Information Filed		
Th	ne <i>private fund</i> (check all that apply; you must check at least one):		
V	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1		
V	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1		
Lis	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 st the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed	940	s N
Lis (a	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 st the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed Is this a "master fund" in a master-feeder arrangement?	940	
Lis (a	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 st the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed	940 Y e	
Lis (a	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 st the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed Is this a "master fund" in a master-feeder arrangement? 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> ?	940 Ye	
Lis (a	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 set the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered. No Information Filed Is this a "master fund" in a master-feeder arrangement? 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	940 Ye	
Lis (a (b (c)	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (4) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (5) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (6) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (6) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (6) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (6) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (7) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (8) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (8) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (9) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (9) qualifies for the exclusion from the exclusion from the Investment Company Act of 1 (9) qualifies for the exclusion from the exclusion from the Investment Company Act of 1 (9) qualifies for the exclusion from the exclusion from the Investment Company Act of 1 (9) qualifies for the exclusion from the exclusion from the Investment Company	940 Ye	s N
Lis (a (b)	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (3) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (4) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (5) Is the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered. No Information Filed No Information Filed Is this a "feeder fund" in a master-feeder arrangement? No Information Filed Is this a "feeder fund" in a master-feeder arrangement? If yes, what is the name and private fund identification number (if any) of the master fund in which this private fund invests?	940 Ye	s N
Lis (a (b) (d) (d)	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the Investm	Ye C	s N
Lis (a (b) (c) (d) NC fo	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion from the definition 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the exclusion 3(c)(1) of the Investment Company Act of 1 (2) qualifies for the Investment Company Act o	Ye C	s N

	mul	Itiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
			Yes	No
8.		Is this <i>private fund</i> a "fund of funds"?	_	•
	veh	TE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment nicles, regardless of whether they are also <i>private funds</i> or registered investment companies.		
	(a)	If yes, does the private fund invest in funds managed by you or by a related person?	0	0
			Yes	No
9.		ring your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment mpany Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	Wha	at type of fund is the <i>private fund</i> ?		
		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 $^{f C}$ Other <i>priva</i> NG ONLY EQUITY FUND	te fur	d:
	NO	TE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Cur	rent gross asset value of the <i>private fund</i> :		
	\$ 9	7,963,019		
Ow	ners	ship		
<u> </u>	11010			
12.		imum investment commitment required of an investor in the <i>private fund</i> :		
		,000,000 TE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the		
		anizational documents of the fund).		
13.	Арр	proximate number of the <i>private fund's</i> beneficial owners:		
	25			
14.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by you and your related persons:		
	249	%		
15.	(a)	What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0%			
	(h)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment	Yes	
	(D)	Company Act of 1940, are sales of the fund limited to qualified clients?	0	0
16	\//h:	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
10.	0%			
You	<u>ur Ac</u>	dvisory Services	Yes	Nο
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	0	•
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	to	
		No Information Filed		
			Yes	No
18.		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	\circ	\odot
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank.	answ	er
		No Information Filed		
			Yes	No
19.		your clients solicited to invest in the private fund?	\odot	0
	NO	TE: For purposes of this question, do not consider feeder funds of the private fund.		
20.	Apn	proximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		

0%

assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it issued

۱f	yes, provide the <i>private fund's</i> Form D file number (if any):		
	orm D file number		
	21-392609		
·ED\	ICE PROVIDERS		
LKV	ICE PROVIDERS		
dito	<u>rs</u>	Υє	es l
(a	(1) Are the private fund's financial statements subject to an annual audit?	•	9
	(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	9
	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 audityou must complete questions (b) through (f) separately for each auditing firm.	ting fir	·m,
	Additional Auditor Information : 1 Record(s) Filed.		
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm.		
	(b) Name of the auditing firm:		
	DELOITTE & TOUCHE LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country: CHICAGO Illinois United States		
	CHICAGO IIIIIOIS UTILEU States	Yes	Nc
	(d) Is the auditing firm an independent public accountant?	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 34		
	(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 l
(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?	•	9
(h	Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified	opinic	วทร?
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report	is ava	ilab
me	<u>Broker</u>		
(a	Does the <i>private fund</i> use one or more prime brokers?		es I
. (u	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If <i>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.	the <i>pri</i>	
	No Information Filed		

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

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Private Offering

Additional Custodia	n Information : 1 Record(s) Filed.		
· ·		ons (b) through g) below for each custodian the <i>private fund</i> usostions (b) through (g) separately for each custodian.	es. If the _i
(b) Legal name of THE NORTHERN	custodian: I TRUST COMPANY		
	ss name of custodian: I TRUST COMPANY		
(d) The location of	the custodian's office responsible for cus	stody of the private fund's assets (city, state and country):	
City: CHICAGO	State: Illinois	Country: United States	
			,
(e) Is the custodia	n a <i>related person</i> of your firm?		
(f) If the custodian	n is a broker-dealer, provide its SEC regist	tration number (if any):	
- CRD Number (if	fany):		
	. 4. 97.		
(g) If the custodian identifier (if any		ealer but does not have an SEC registration number, provide its	s legal enti
.0,		ealer but does not have an SEC registration number, provide its	s legal enti
identifier (if any		ealer but does not have an SEC registration number, provide its	s legal enti
.0,		ealer but does not have an SEC registration number, provide its	s legal enti
identifier (if any			s legal enti
identifier (if any identifier) trator Does the private fund If the answer to ques	() If use an administrator other than your firm stion 26.(a) is "yes," respond to questions	m? s (b) through (f) below. If the <i>private fund</i> uses more than one a	
identifier (if any identifier) trator Does the private fund find the answer to quest must complete quest	v) If use an administrator other than your firm	m? s (b) through (f) below. If the <i>private fund</i> uses more than one a	
identifier (if any identifier) Does the private fund for the answer to quest must complete quest Additional Administ	(use an administrator other than your firms stion 26.(a) is "yes," respond to questions ions (b) through (f) separately for each actrator Information: 1 Record(s) Filed.	m? s (b) through (f) below. If the <i>private fund</i> uses more than one administrator. ons (b) through (f) below. If the <i>private fund</i> uses more than one	administra
identifier (if any identifier (if any identifier) Does the private fund the answer to quest must complete quest Additional Administ If the answer to quest administrator, you	duse an administrator other than your firms tion 26.(a) is "yes," respond to questions ions (b) through (f) separately for each actrator Information: 1 Record(s) Filed. Testion 26.(a) is "yes," respond to question must complete questions (b) through (f) separately for each actrator information.	m? s (b) through (f) below. If the <i>private fund</i> uses more than one administrator. ons (b) through (f) below. If the <i>private fund</i> uses more than one	administra
identifier (if any identifier (if any identifier) Does the private fund fund in the answer to quest identified and in the answer to quest identified answer to quest identified administrator, you (b) Name of administrator	duse an administrator other than your firms tion 26.(a) is "yes," respond to questions ions (b) through (f) separately for each actrator Information: 1 Record(s) Filed. Testion 26.(a) is "yes," respond to question must complete questions (b) through (f) separately for each actrator information.	m? s (b) through (f) below. If the <i>private fund</i> uses more than one administrator. ons (b) through (f) below. If the <i>private fund</i> uses more than one	administra
identifier (if any identifier (if any identifier) Does the private fund the answer to quest must complete quest Additional Administ If the answer to quest administrator, you (b) Name of adminimate the NORTHERN	when the stion 26. (a) is "yes," respond to questions ions (b) through (f) separately for each actrator Information: 1 Record(s) Filed. The stion 26. (a) is "yes," respond to question must complete questions (b) through (f) ships instrator:	m? s (b) through (f) below. If the <i>private fund</i> uses more than one administrator. ons (b) through (f) below. If the <i>private fund</i> uses more than one	administra
identifier (if any identifier (if any identifier) Does the private fund the answer to quest must complete quest Additional Administ If the answer to quest administrator, you (b) Name of administration of ad	duse an administrator other than your firms tion 26.(a) is "yes," respond to questions ions (b) through (f) separately for each actrator Information: 1 Record(s) Filed. Testion 26.(a) is "yes," respond to question must complete questions (b) through (f) shistrator: TRUST COMPANY ministrator (city, state and country): State:	m? s (b) through (f) below. If the <i>private fund</i> uses more than one administrator. ons (b) through (f) below. If the <i>private fund</i> uses more than on separately for each administrator. Country:	administra
identifier (if any identifier (if any identifier) Does the private fund of the answer to quest must complete quest Additional Administ If the answer to quest administrator, you (b) Name of administration of	d use an administrator other than your firms of the stion 26. (a) is "yes," respond to questions ions (b) through (f) separately for each actrator Information: 1 Record(s) Filed. Testion 26. (a) is "yes," respond to question must complete questions (b) through (f) shistrator: N TRUST COMPANY ministrator (city, state and country):	m? s (b) through (f) below. If the <i>private fund</i> uses more than one administrator. ons (b) through (f) below. If the <i>private fund</i> uses more than on separately for each administrator.	administra
identifier (if any identifier (if any identifier) If the answer to quest must complete quest Additional Administ If the answer to quest administrator, you (b) Name of administrator, you administrator, you (c) Location of administrator, city: CHICAGO	duse an administrator other than your firms tion 26.(a) is "yes," respond to questions ions (b) through (f) separately for each actrator Information: 1 Record(s) Filed. Testion 26.(a) is "yes," respond to question must complete questions (b) through (f) shistrator: TRUST COMPANY ministrator (city, state and country): State:	m? s (b) through (f) below. If the <i>private fund</i> uses more than one administrator. ons (b) through (f) below. If the <i>private fund</i> uses more than on separately for each administrator. Country:	administra
identifier (if any identifier (if any identifier (if any identifier)) If the answer to quest must complete quest Additional Administ If the answer to quest administrator, you (b) Name of administrator, you (c) Location of administrator (ity: CHICAGO) (d) Is the administrator (if any identifier)	duse an administrator other than your firmstion 26.(a) is "yes," respond to questions ions (b) through (f) separately for each actrator Information: 1 Record(s) Filed. Destion 26.(a) is "yes," respond to question must complete questions (b) through (f) shistrator: N TRUST COMPANY Ininistrator (city, state and country): State: Illinois Errator a related person of your firm?	m? s (b) through (f) below. If the <i>private fund</i> uses more than one administrator. ons (b) through (f) below. If the <i>private fund</i> uses more than on separately for each administrator. Country:	administra

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*.

100%

28.	(a)			No
	(u)	Does the private fund use the services of someone other than you or your employees for marketing purposes?	0	•
		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.		
		No Information Filed		
A. PR	RIVAT	TE FUND		
<u>I nfor</u>	rmat	ion About the <i>Private Fund</i>		
1.	(a)	Name of the <i>private fund</i> :		
		AXIOM INVESTORS TRUST II (AXIOM EMERGING MARKETS EQUITY FUND)		
	. ,	Private fund identification number: (include the "805-" prefix also)		
		805-2570441777		
2.		er the laws of what state or country is the <i>private fund</i> organized:		
		State: Country: Delaware United States		
		Delaware Officed States		
3.		Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):		
		me of General Partner, Manager, Trustee, or Director OM INVESTORS LLC		
	(b)	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.		
		No Information Filed		
4.	The	private fund (check all that apply; you must check at least one):		
		(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940		
		(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List	the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
		No Information Filed		
			Yes	No
6.		Is this a "master fund" in a master-feeder arrangement?	0	•
	(a)	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		
		No mismaton med		
			Yes	No
	(c)	Is this a "feeder fund" in a master-feeder arrangement?	0	\odot
		If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
		Private fund identification number: (include the "805-" prefix also)		
		E: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section the master-feeder arrangement or reporting on the funds separately.	7.B.(1)

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		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	\odot
	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also private funds or registered investment companies.	t	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	0
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the <i>private fund</i> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other <i>priva</i> LONG ONLY EQUITY FUND	te fui	าd:
	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> : \$ 882,830,059		
<u>Owi</u>	n <u>ership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 5,000,000 NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the	2	
	organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 73		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> :		
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 from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	r Advisory Services		
17.	(a) Are you a subadviser to this <i>private fund</i> ?	res	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> . If the answer question 17.(a) is "no," leave this question blank.		•
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	\circ	\odot
	(b) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank.	answ	rer
	No Information Filed		

19. Are your *clients* solicited to invest in the *private fund*?

Yes No

© O

	pproximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>Privat</u>	te Offering	V N	_
21. H	as the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Yes No	
22. If	yes, provide the <i>private fund's</i> Form D file number (if any):		
	Form D file number		
	021-106137		╛
3. SER	VICE PROVIDERS		
Audito	<u>ors</u>		
22 (-		Yes N	
23. (8	(1) Are the private fund's financial statements subject to an annual audit?(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	0 0	
	If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one audi you must complete questions (b) through (f) separately for each auditing firm.	⊙ Citing 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: DELOITTE & TOUCHE LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: State: Country: CHICAGO Illinois United States		
		Yes No	
	(d) Is the auditing firm an independent public accountant?	O	
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?		
	If yes, Public Company Accounting Oversight Board-Assigned Number: 34		
	(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	
		Yes N	ıc
(9	g) Are the private fund's audited financial statements for the most recently completed fiscal year distributed to the private fund's investors?	© (
(h	n) Do all of the reports prepared by the auditing firm for the private fund since your last annual updating amendment contain unqualified	l opinions?	
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the report	t is available	۶.
<u>Prime</u>	<u>e Broker</u>		
24. (a	a) Does the <i>private fund</i> use one or more prime brokers?	Yes N	
	If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the <i>private fund</i> uses. If <i>fund</i> uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.		
	No Information Filed		

NOTE: For purposes of this question, do not consider feeder funds of the private fund.

If the answer to question 25 (a) is "yes," respond to questions (b) through (g) separately for each custodian the arrivate fund uses. If 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. If the answer to question 25 (a) is "yes," respond to questions (b) through (g) separately for each custodian the private fund uses. If the private fund uses more than one austrodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian. (c) Primary business name of custodian: THE NORTHERN TRUST COMPANY (d) The location of the custodian's office responsible for custody of the provide fund's assets (city, state and country): City CHICACO III inois United States Ye (e) Is the custodian a related person of your time? (f) If the custodian is a broker-dealer, provide its SEC registration number (if any): (g) If the custodian is a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity intention (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 intention (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 intention (if any): (g) If the answer is question 26 (a) is "yes," respond to questions (b) through (i) below. If the private fund uses more than one administrator information : 1 Record(s) Filed. If the answer is question 26 (a) is "yes," respond to questions (b) through (i) below. If the private fund uses more than one administrator information : 1 Record(s) Filed. If the answer is question 26 (a) is "yes," respond to questions (b) through (i) below. If the private fund uses more than one administrator information is 1 Record(s) Filed. If the answer is question 26 (a) is "yes," respond to questions (b)	16.0						
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fund uses more than one custodian, you must complete questions (b) through (g) separately for each custodian. (b) Legal name of custodian. (c) Primary business name of custodian: THE NORTHERN TRUST COMPANY (d) The location of the custodian's office responsible for custody of the private fund's assets (city, state and country): CITY: CHICACO Illinois United States (e) Is the custodian a related person of your firm? (f) If the custodian is a broker-dealer, provide its SEC registration number (if any): CRD Number (if any): (g) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if any) (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) (g) Does the private fund use an administrator other than your firm? If the answer to question 26 (a) is "yes," respond to questions (b) through (i) below. If the private fund uses more than one administrate must complete questions (b) through (i) 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 (i) below. If the private fund uses more than one administrator, you must complete questions (b) through (i) separately for each administrator. (b) Name of administrator: THE NORTHERN TRUST COMPANY (c) Location of administrator (city, state and country): City: ChiCACO Illinois United States Ves (d) Is the administrator a related person of your firm?	Additional Custodian Informat	Additional Custodian Information : 1 Record(s) Filed.					
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CHICAGO Illinois United States Ye (e) Is the custodian a related person of your firm? (f) If the custodian is a broker-dealer, provide its SEC registration number (if any): CRID 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 antity identifier (if any) Istrator Does the private fund use an administrator other than your firm? If the answer to question 26. (a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one administrator 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 private fund uses more than one administrator, you must complete questions (b) through (f) separately for each administrator. (b) Name of administrator: THE NORTHERN TRUST COMPANY (c) Location of administrator (city, state and country): City: State: Country: CHICAGO Illinois United States Yes (d) Is the administrator a related person of your firm?	(d) The location of the custod	ian's office responsible for custoo	dy of the <i>private fund's</i> assets (city, state and country):				
(e) Is the custodian a related person of your firm? (f) If the custodian is a broker-dealer, provide its SEC registration number (if any):			· · · · · · · · · · · · · · · · · · ·				
(e) Is the custodian a related person of your firm? (f) If the custodian is a broker-dealer, provide its SEC registration number (if any):	CHICAGO	Illinois					
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(e) Does the administrator prepare and send investor account statements to the <i>private fund's</i> investors?	Does the <i>private fund</i> use an adr If the answer to question 26.(a) must complete questions (b) thr Additional Administrator Infor If the answer to question 26.(administrator, you must comp (b) Name of administrator: THE NORTHERN TRUST CO (c) Location of administrator (City:	is "yes," respond to questions (brough (f) separately for each admirmation: 1 Record(s) Filed. (a) is "yes," respond to questions elete questions (b) through (f) separately for each admirmation: 1 Record(s) Filed.	(b) through (f) below. If the <i>private fund</i> uses more than one parately for each administrator. Country: United States				
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	rele	lude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including obtaining any evant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (including cations) was the valuation determined by such <i>person</i> .	j
Ma	rkete	<u>ers</u>	
			es No
28.	(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 fun</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. P	RIVA	TE FUND	
<u>Info</u>	<u>orma</u>	tion About the <i>Private Fund</i>	
1.		Name of the <i>private fund</i> : AXIOM INVESTORS TRUST II (AXIOM EMERGING MARKETS WORLD EQUITY FUND) Private fund identification number: (include the "805-" prefix also) 805-4269900721	
2.	Und	der the laws of what state or country is the <i>private fund</i> organized: State: Delaware United States	
3.	Na	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity): me of General Partner, Manager, Trustee, or Director IOM INVESTORS LLC	
	(b)	If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.	
		No Information Filed	
4 . 5 .	V	e private fund (check all that apply; you must check at least one): (1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940 (2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940 the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.	
		No Information Filed	
6.		Is this a "master fund" in a master-feeder arrangement? 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> ?	es No ○ ⊙
		No Information Filed	
	(c) (d)	La thia a "facedor firmed" in a magazine facedor armanagamant?	es No
		Private fund identification number: (include the "805-" prefix also)	
	NO ⁻	TE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section 7.E	B.(1)

for the master-feeder arrangement or reporting on the funds separately.

your related person?

100%

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), the feeder funds answer the following questions:		11 01
	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 assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	it issue	
		Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?	0	•
	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.	ent	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	0
		~	~
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	•	0
10.	What type of fund is the <i>private fund</i> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other prices of the control of the	ivate fui	nd:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
11.	Current gross asset value of the <i>private fund</i> : \$ 31,011,684		
Ow	nership		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 5,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in organizational documents of the fund).	the	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 14		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 2%		
15.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds:		
	0%	Yes	. No
	(b) If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	0	0
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
Υοι	ur Advisory Services		
<i>a</i> –		Yes	
17.	(a) Are you a subadviser to this <i>private fund</i>?(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i>. If the answer question 17.(a) is "no," leave this question blank.	over to	•
	No Information Filed		
		Yes	No
18.	(a) Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	•

	to question 18.(a) is "no," leave this question blank.		
	No Information Filed		
10	Are your allows called to invest in the private fund		s No
19.	Are your <i>clients</i> solicited to invest in the <i>private fund</i> ? NOTE: For purposes of this question, do not consider feeder funds of the private fund.	•	0
	TVOTE. TO Purposes of this question, do not consider recaer rands of the private rand.		
20.	Approximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ? 0%		
Priv	vate Offering		
		Yes	s 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 021-306618		
3. SI	ERVICE PROVIDERS		
Aud	<u>litors</u>	Ye	s 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 than one aud you must complete questions (b) through (f) separately for each auditing firm.	iting firr	n,
	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: DELOITTE & TOUCHE LLP		
	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
	City: State: Country:		
	CHICAGO Illinois United States		
	(d) Is the auditing firm an <i>independent public accountant</i> ?	Yes	
	(a) To the additing mini an masperial in page a deceantain.	•	0
	(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
	If yes, Public Company Accounting Oversight Board-Assigned Number: 34		
	(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
	(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?	Ye:	s No
	(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> contain unqualified	d opinion	ns?
		·	
	If you check "Report Not Yet Received," you must promptly file an amendment to your Form ADV to update your response when the repor	t is avai	lable.
<u>Prir</u>	ne Broker		
2.4	(a) Does the private funduos one or more private brokens?		s No
∠4.	(a) Does the <i>private fund</i> use one or more prime brokers?	- 0	

If the answer to question 24.(a) is "yes," respond to questions (b) through (e) below for each prime broker the private fund uses. If the private

fund uses more than one prime broker, you must complete questions (b) through (e) separately for each prime broker.

No	Inform	nation	Filod
171()	ппоп	танст	FILECT

0-		diar	
	ISTO	ouar	٦

f the answer to question 25.(a) fund uses more than one custodic	an, you must complete questions	s (b) through (g) separately for each custodian.	·	
Additional Custodian Informati	ion : 1 Record(s) Filed.			
·		(b) through g) below for each custodian the <i>private fund</i> use ons (b) through (g) separately for each custodian.	es. If the μ	
(b) Legal name of custodian: THE NORTHERN TRUST COM	ЛРАNY			
(c) Primary business name of THE NORTHERN TRUST COM				
(d) The location of the custodi	an's office responsible for <i>custoa</i>	y of the private fund's assets (city, state and country):		
City: CHICAGO	State: Illinois	Country: United States		
5.115/100	minois	Omited States	١	
(e) Is the custodian a related μ	person of your firm?		(
(f) If the custodian is a broker-dealer, provide its SEC registration number (if any):				
(f) If the custodian is a broker	dealer, provide its 320 registral	3,		
(f) If the custodian is a broker-CRD Number (if any):	dealer, provide its 320 registral			
- CRD Number (if any):		er but does not have an SEC registration number, provide its	legal entii	
- CRD Number (if any): (g) If the custodian is not a br identifier (if any)			legal enti	
- CRD Number (if any): (g) If the custodian is not a br identifier (if any)	oker-dealer, or is a broker-deale		legal enti	
- CRD Number (if any): (g) If the custodian is not a bridentifier (if any) rator Does the private fund use an adm f the answer to question 26.(a)	oker-dealer, or is a broker-deale	or but does not have an SEC registration number, provide its		
CRD Number (if any): (g) If the custodian is not a bridentifier (if any) rator Does the private fund use an adm of the answer to question 26.(a) must complete questions (b) through	oker-dealer, or is a broker-dealer ninistrator other than your firm? is "yes," respond to questions (bough (f) separately for each adm	or but does not have an SEC registration number, provide its		
CRD Number (if any): (g) If the custodian is not a bridentifier (if any) rator Does the private fund use an adm f the answer to question 26.(a) must complete questions (b) through the answer to question 2 for a complete fund the answer to question 2 for a complete question 2	oker-dealer, or is a broker-dealer ninistrator other than your firm? is "yes," respond to questions (bough (f) separately for each adm mation: 1 Record(s) Filed.	by through (f) below. If the <i>private fund</i> uses more than one a linistrator.	ıdministra	
CRD Number (if any): (g) If the custodian is not a bridentifier (if any) rator Does the private fund use an adm f the answer to question 26.(a) must complete questions (b) through the answer to question 2 for a complete fund the answer to question 2 for a complete question 2	oker-dealer, or is a broker-dealer of the power of the po	by through (f) below. If the <i>private fund</i> uses more than one a linistrator.	ıdministra	
CRD Number (if any): (g) If the custodian is not a bridentifier (if any) rator Does the private fund use an adm f the answer to question 26.(a) must complete questions (b) through the answer to question 26.(a) administrator, you must complete administrator, you must complete the Northern Trust Control of the Northern Trust Control	oker-dealer, or is a broker-dealer ininistrator other than your firm? is "yes," respond to questions (bough (f) separately for each adm mation: 1 Record(s) Filed. a) is "yes," respond to questions ete questions (b) through (f) separately for each adm APANY	by through (f) below. If the <i>private fund</i> uses more than one a linistrator.	ıdministra	
CRD Number (if any): (g) If the custodian is not a bridentifier (if any) rator Does the private fund use an admit the answer to question 26. (a) must complete questions (b) through the answer to question 26. (a) administrator Inform If the answer to question 26. (a) administrator, you must complete the administrator of administrator: THE NORTHERN TRUST COME. (c) Location of administrator (a) City:	oker-dealer, or is a broker-dealer ininistrator other than your firm? is "yes," respond to questions (bough (f) separately for each adm mation: 1 Record(s) Filed. a) is "yes," respond to questions ete questions (b) through (f) separately for each sete questions (b) through (f) separately for each adm MPANY city, state and country): State:	by through (f) below. If the <i>private fund</i> uses more than one a inistrator. (b) through (f) below. If the <i>private fund</i> uses more than one are inistrator. Country:	ıdministra	
CRD Number (if any): (g) If the custodian is not a bridentifier (if any) rator Does the private fund use an admit the answer to question 26. (a) nust complete questions (b) through the answer to question 26. (a) administrator, you must complete administrator, you must complete the Northern Trust control (c) Location of administrator (d)	oker-dealer, or is a broker-dealer ninistrator other than your firm? is "yes," respond to questions (bough (f) separately for each adm mation: 1 Record(s) Filed. a) is "yes," respond to questions ete questions (b) through (f) separately for each adm MPANY city, state and country):	by through (f) below. If the <i>private fund</i> uses more than one a inistrator. (b) through (f) below. If the <i>private fund</i> uses more than one arrately for each administrator.	ıdministra	

(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."		
		ng 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 related person?	is not	
	Inclu rele	ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including obtaining and vant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (includations) was the valuation determined by such <i>person</i> .	-	
<u> Mar</u>	kete	<u>rs</u>		
ο Ω	(2)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	Yes	
_0.		You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicito similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.		•
		No Information Filed		
. PR	IVAT	TE FUND		
<u>nfo</u> ı	<u>mat</u>	ion About the <i>Private Fund</i>		
1.	(a)	Name of the <i>private fund</i> :		
		AXIOM INVESTORS TRUST II (AXIOM INTERNATIONAL EQUITY FUND II)		
		Private fund identification number:		
		(include the "805-" prefix also) 805-5866712060		
		003-3000712000		
2	Und	er the laws of what state or country is the <i>private fund</i> organized:		
۷.		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):		
		ne of General Partner, Manager, Trustee, or Director		
	AXI	OM INVESTORS LLC		
	(1.)			
	(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		
		No finormation riled		
4.	The	private fund (check all that apply; you must check at least one):		
		(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940		
	~	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
5.	List	the name and country, in English, of each foreign financial regulatory authority with which the private fund is registered.		
		No Information Filed		
			Yes	No
6.	(a)	Is this a "master fund" in a master-feeder arrangement?	\circ	\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	•
		If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
		Private fund identification number:		

(include the "805-" prefix also)

7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions:	eacl	า of
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.	ssue	ed
0	(a) Is this <i>private fund</i> a "fund of funds"?	Yes	
8.	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	0	•
	vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies. (b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	_	_
	(b) If yes, does the private rand livest in failaged by you of by a related person:	0	0
		Yes	No
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	0	•
10.	What type of fund is the private fund?		
	C hedge fund C liquidity fund C private equity fund C real estate fund C securitized asset fund C venture capital fund C Other private LONG ONLY EQUITY FUND	e fur	ıd:
	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> : \$ 824,422,075		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the private fund:		
	\$ 5,000,000 NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		
13.	Approximate number of the <i>private fund's</i> beneficial owners: 30		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 1%		
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 O	No O
16.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		
<u>You</u>	ur Advisory Services		
<i></i>		Yes	
17.	(a) Are you a subadviser to this <i>private fund</i> ? (b) If the answer to question 17 (a) is "yes " provide the name and SEC file number, if any, of the advisor of the private fund. If the answer to	O to	•
	(b) If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the private fund. If the answer to	ιΟ	

No Information Filed

question 17.(a) is "no," leave this question blank.

	(a) D	o any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	C	(
		the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the question 18.(a) is "no," leave this question blank.	ne ans	swer
		No Information Filed		
			Υe	s N
19.	Are y	our clients solicited to invest in the private fund?	•	
	NOTE	For purposes of this question, do not consider feeder funds of the private fund.	_	
	Appro	ximately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
Priv	<u>rate O</u>	ffering		
21.	Has t	ne private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	Ye	s N
22.	If yes	provide the <i>private fund's</i> Form D file number (if any):		
	Form	D file number		
	021-	109924		
. SE	ERVICE	PROVIDERS		
Audi	litors			
			Υe	s N
23.	(a) () Are the private fund's financial statements subject to an annual audit?	G	0
	(:	2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	G	,
	11	the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one audit		
		ou must complete questions (b) through (f) separately for each auditing firm.		,
		additional Auditor Information : 1 Record(s) Filed.		
	,	additional Addition Thiormation . The cord(s) Flied.		
		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:		
		DELOITTE & TOUCHE LLP		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
		(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) 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
		(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		_
		(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		_
		 (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: CHICAGO State: Country: United States (d) Is the auditing firm an <i>independent public accountant</i>? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? 	•	0
		 (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City:	•	0
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: CHICAGO State: Country: United States (d) Is the auditing firm an <i>independent public accountant</i> ? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? If yes, Public Company Accounting Oversight Board-Assigned Number:	•	0
		(c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: CHICAGO Illinois United States (d) Is the auditing firm an <i>independent public accountant</i> ? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in	••	0 0
		(c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: CHICAGO Illinois United States (d) Is the auditing firm an <i>independent public accountant</i> ? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (f) If "yes" to (e) above, is the auditing firm subject to regular inspection by the Public Company Accounting Oversight Board in	••	O O
	ir (h) D	(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: CHICAGO Illinois United States (d) Is the auditing firm an <i>independent public accountant</i> ? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (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?	⊙Ye⊙	0 0

Prime Broker

		No	Information Filed	
dian				
<u>Miaii</u>				Yes
lf t	he answer to question 25.(a) is "y	es," respond to questions (k	kers listed above) to hold some or all of its assess through (g) below for each custodian the private (b) through (g) separately for each custodian.	•
Ad	lditional Custodian Information :	1 Record(s) Filed.		
	•	•	(b) through g) below for each custodian the <i>pri</i> ns (b) through (g) separately for each custodian	·
(1	b) Legal name of custodian: THE NORTHERN TRUST COMPAN	ΙΥ		
(0	c) Primary business name of custo THE NORTHERN TRUST COMPAN			
(d) The location of the custodian's	office responsible for <i>custoa</i>	y of the <i>private fund's</i> assets (city, state and cou	ntry):
	City: CHICAGO	State: Illinois	Country: United States	
	a) Is the gustadian a related person	on of your firm?		Yes I
	e) Is the custodian a <i>related perso</i>	nt or your minn:		O
(1	f) If the custodian is a broker-dea	ller, provide its SEC registra	ion number (if any):	
	- CRD Number (if any):			
(g) If the custodian is not a broker identifier (if any)	-dealer, or is a broker-deale	r but does not have an SEC registration number	provide its <i>legal entity</i>
<u>istrat</u>	tor			Yes
) Doe	es the <i>private fund</i> use an administ	trator other than your firm?		•
	he answer to question 26.(a) is "y st complete questions (b) through) through (f) below. If the <i>private fund</i> uses mor	e than one administrator, y
			mstrator.	

Yes No

	(e) Does the administrator prepare and send investor account statements to the private fund's 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."		
У	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 your <i>related person</i> ? 100%	s not	
l:	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>lark</u>	<u>keters</u>		
8. ((a) Does the private fund use the services of someone other than you or your employees for marketing purposes?	Yes	NO.
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor 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 t</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		
PRI	IVATE FUND		
forn	mation About the <i>Private Fund</i>		
. ((a) Name of the <i>private fund</i> :		
(AXIOM INVESTORS TRUST II (AXIOM INTERNATIONAL SMALL-CAP EQUITY FUND) (b) Private fund identification number:		
· ·	(include the "805-" prefix also)		
	805-7741710837		
. L	Under the laws of what state or country is the <i>private fund</i> organized: State: Country:		
	State: Country: Delaware United States		
((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		
	AXIOM INVESTORS LLC		
((b) If filing an umbrella registration, identify the filing adviser and/or relying adviser(s) that sponsor(s) or manage(s) this private fund.		
	No Information Filed		
. Т	The <i>private fund</i> (check all that apply; you must check at least one):		
Г	(1) qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940		
F	(2) qualifies for the exclusion from the definition of investment company under section 3(c)(7) of the Investment Company Act of 1940		
1	List the name and country, in English, of each <i>foreign financial regulatory authority</i> with which the <i>private fund</i> is registered.		
	No Information Filed		
		Yes	No
. ((a) Is this a "master fund" in a master-feeder arrangement?	0	•
((b) If yes, what is the name and private fund identification number (if any) of the feeder funds investing in this private fund?		
	No Information Filed		
		Yes	No
(((c) Is this a "feeder fund" in a master-feeder arrangement?	O	⊙
			-0

	(d) If yes, what is the name and <i>private fund</i> identification number (if any) of the master fund in which this <i>private fund</i> invests? Name of <i>private fund</i> :		
	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 for the master-feeder arrangement or reporting on the funds separately.	'.B.(´	1)
	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions:	each	n of
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially all of assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it is multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		d
	(a) Is this private fund a "fund of funds"?		
•	NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	0	•
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	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.)?		•
Ο.	What type of fund is the <i>private fund</i> ?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other private LONG ONLY EQUITY FUND	e fun	d:
	NOTE: For definitions of these fund types, please see Instruction 6 of the Instructions to Part 1A.		
1.	Current gross asset value of the <i>private fund</i> : \$ 253,371,293		
<u>)w</u>	<u>vnership</u>		
2.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 5,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in the organizational documents of the fund).		
3.	Approximate number of the <i>private fund's</i> beneficial owners: 58		
4.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 6%		
5.	(a) What is the approximate percentage of the <i>private fund</i> beneficially owned (in the aggregate) by funds of funds: 0%	V.o.o.	No
	(1) 16 1	Yes	
6.	What is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> : 0%		

Your Advisory Services

(b) If the answer to question 17 (a) is "yes," provide the name and SEC file number. If any, of the advisor of the private fund if the answer to question 17 (a) is "yes," provide the name and SEC file number. If any, of the advisor of the private fund? (a) Do any investment advisors (other than the investment advisors isted in Section 7.8 (1) A.3 (b)) advise the private fund? (b) If the answer to question 18 (a) is "yes," provide the name and SEC file number. If any, of the other advisors to the private fund? (c) If the answer to question 18 (a) is "yes," provide the name and SEC file number. If any, of the other advisors to the private fund? (d) Any your elects solicited to invest in the private fund? (e) Any your elects solicited to invest in the private fund? (f) Approximately what percentage of your elects has invested in the private fund? (f) Approximately what percentage of your elects has invested in the private fund? (f) Approximately what percentage of your elects has invested in the private fund? (g) If the subsect fund over relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? (g) If yes, provide the private fund's financial statements subject to an annual audit? (g) If the answer to question 23 (a)(1) is "yes," are the financial statements prepared in accordance with U.S. CAAP? (g) If the answer to question 23 (a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, your must complete questions (b) through (f) separately for each auditing firm. (g) Name of the auditing firm's office responsible for the private fund's sucit (city, state and country): (d) The location of the auditing firm's office responsible for the private fund's sucit (city, state and country): (d) The location of the auditing firm's office responsible for the private fund's sucit (city, state and country):	No Information Filed Yes (a) Dit any investment advisors (other than the investment advisors field in Section 7.0.(1) A.1.(9) advise the private Anual (or it the answer to question 18.(a) is "yes," provide the name and Set I lie number (if any, or the other advisors to the private Anual (in the answer to question 18.(a) is "yes," provide the name and Set I lie number (if any, or the other advisors to the private Anual (in the answer to question 18.(a) is "yes," provide the name and Set I lie number (if any, or the other advisors to the private Anual (in the answer to question 18.(a) is "yes," provide the name and Set I lie number (if any): **Record of the private socialists to invest in this private feature feature fund? Any year relief so and exemption from registration or its securities under Regulation II or the Securities Act of 1932? Any year private Anual ever relied on an exemption from registration or its securities under Regulation II or the Securities Act of 1932? It was provide the private Anual's frame II lie number (if any): **Transport of the private Anual's frame is satisfaced as satisfact for its securities under Regulation II or the Securities Act of 1932? Yes (a) (1) And the private Anual's frame is satisfaced as satisfact for its securities under Regulation II or the Securities Act of 1932? Yes (b) (1) And the private Anual Securities statisfaced as satisfact for its securities under Regulation II or the Securities Act of 1932? Yes (c) (1) And the private Anual Securities statisfaced as satisfact for its private regulation in accordance with U.S. GAAT? (c) (1) the answer to question 23 (a)(1) is "yes" respond to questions (a) firmingh (b) below. If the private fund season more than one auditing firm year must complete questions (b) through (b) separately for each auditing firm your must complete questions (c) through (b) separately for each auditing firm your must complete funds and the private funds auditing firm your must complete funds and the private funds and first the priv	Oil It he provide to question 1.1 (a) is "hos." provide the name and bed the number in any, or the advisor or the private runo. If the answer to question 17 (a) is "no," leave this question blank. No information Titled Yes N Do any investment advisors (other than the investment advisors listed in Section 7.8 (1) A.3 (b)) advise the private runo? Oil It he answer to question 18 (c) is "yes," provide the name and sectile number. If any, of the other advisors to the private runo? Oil It has netwer to question 18 (c) is "yes," provide the name and sectile number. If any, of the other advisors to the private runo? No information Titled Yes N Person provides the first advisors of the private runo? Oil It has netwer to question 18 (a) is "yes," provide the name and sectile runo. No information Titled Yes N Oil The customs and section of the number (if only). The Office runo Yes N Oil The answer to question 23 (a) (1) is "yes," record to questions (b) through (ii) below. If the private runo uses more than one additing from poor matter to question 23 (a) (1) is "yes," record to questions (b) through (ii) below. If the private runo uses more from one additing from poor matter to question 23 (a) (1) is "yes," respond to questions (b) through (ii) below. If the private runo uses more from one additing from poor matter to question 23 (a) (1) is "yes," respond to questions (b) through (iii) below. If the private runo uses more from one additing from your must combine questions (b) through (ii) below. If the private runo uses more from one additing from pour matter to question 23 (a) (1) is "yes," respond to questions (b) through (ii) below. If the private runo uses more from one additing from pour matter through (ii) separately for each avoiding from a differ into private runo uses more from one additing from a private runo uses more from one additing from a private runo use additing from a filter responsible for the private runo (iii) below. If the private runo demands in question (iii) is the additing from a				
Approximate of Park November	gestion 17 (a) is the first North this glostion island. No linformation Filed Yes (b) Do any invasional advisors (other than the invasional advisors field of Socilin 7.8.(1) A.1.(1)) wiske the private Anal 7 (c) It the answer to question 18 (a) is "yes" provide the name and SkC the number, it any, of the other advisors to the private fund. If the answer to question 18 (a) is "no." Issue this question blank. No Information Filed Yes 7. Act your idents solidited to invasi in the private funds of the genetic funds of the genetic fund. 2. Approximately what percentage or your oberts has invested in the private fund? ONCE: For purposes of the question, do not consider feeder funds of the genetic fund? ONCE: The private funds fund ever relied on an examption from registration of its securities under Regulation D of the Securities Act of 1933? (c) It is the private funds from D file number (if any): Form D file number O21-29988 SURVICE PROVIDERS Latter (c) If the answer to question 32 (a)(1) is "yes," recr. the filmedial slutiments propertial in securities with 6.5. GAAP? (d) Normal private question 32 (a)(1) is "yes," recr. the filmedial slutiments propertial in securities and this 6.5 GAAP? (e) If the answer to question 32 (a)(1) is "yes," recr. the filmedial slutiments propertial in securities and this 6.5 GAAP? (e) If the answer to question 12 (a)(1) is "yes," recr. the filmedial slutiments propertial in securities and this 6.5 GAAP? (f) Are the private fund of the outling film you must complete questions (i) through (i) separately for such auditing firm. Additional Auditor Information of Record(s) Filed. If the answer to question 18 (a) (a) (b) "yes," respond to questions (b) through (b) below, if the private fund uses more than one update in the auditing firm. (b) Name of the auditing firm of the private funds auditing firm (b) private funds auditing firm an integ	Appeal of the provide form to the provide from the fire median subject to an annual audit? (b) (c) An all provide form to the provide from registration of the securities under Regulation D of the Securities Act of 1932? (c) (c) An all provide form to till the provide from registration of the provide form to question 18 (a) is "yes." provide the name and stack in number, if any, of the other advisers to the annuals fund. If the provide form to question 18 (a) is "yes." provide form? (c) I are not any collected to impact in the private form? (d) I are provided to impact in the private form? (e) (f) An annual for the private form to till a number (if any): (e) (f) An annual for the private form's form to till a number (if any): (f) (f) An the private form's form to till a number (if any): (g) (f) An the private form's form 2.5 (a)(f) is "yes." are the financial statements prepared in accordance with U.S. CAAP? (g) (f) If the answer to question 2.5 (a)(f) is "yes." respond to questions (i) through (i) below. If the private form to see seeling form, you must compete questions (ii) through (i) separately for each auditing firm. Additional Auditor Information: 1 Records) Field. (g) The location of the auditing firm's office responsible for the private form's fact and country): (g) Is the readiting firm to prepared with the Paldic Company Accounting Decrepting Records. (g) Is the readiting firm registrated with the Paldic Company Accounting Decrepting Records. (g) Is the readiting firm registrated with the Paldic Company Accounting Decrepting Records. (g) Is the readiting firm registrated with the Paldic Company Accounting Decrepting Records.		a) Are you a subadviser to this <i>private fund</i> ?	0	į
(a) Do any investment advisers (other than the investment advisers Istad in Section 7.8 (1) A.3 (b)) advise the private hund? (b) If the answer to question 18 (a) is "no," leave this question blank. No information Filed Yes No information Filed Yes Are your offents satisfied to invest in the private funds of the private fund. Approximately what percentage of your offents has invested in the private fund. Approximately what percentage of your offents has invested in the private fund. Approximately what percentage of your offents has invested in the private funds. Approximately what percentage of your offents has invested in the private fund. Approximately what percentage of your offents has invested in the private fund. Approximately what percentage of your offents has invested in the private fund. Approximately what percentage of your offents has invested in the private fund. If yes, provide the private fund over relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? From D file number (2) If the answer to question 23 (a)(1) is "yes," are the triancial statements prepared in accordance with D.S. GAAPY (a) If the answer to question 23 (a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information : Record(s) Filed. If the answer to question 23 (a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. BECOTITE 3 (QUESTION IS Tyes," respond to questions (b) through (f) separately for each auditing firm. BECOTITE 3 (QUESTION IS Tyes," respond to questions (b) through (g) separately for each auditing firm. CITY State and country: (a) Name or the auditing firm's office responsible for the private funds additing firm an independent public accountent?	(a) Do any investment advisors (other than the investment advisors listed in Section 7.B.(1).A.(1,0)) advise the prevate rund. (b) If the answer to question 18.(a) is "yes," provide the name and SEC tile number, it any, of the other advisors to the prevate rund. If the answer to question 18.(a) is "no." leave this question blank. No information filled Ves. Note: Por purposes or ruls question, do not consister feeder funds or the private fund. Approximately what personalisps of your charsh has invosted in the private fund? (b) Note: Por purposes or ruls question and commption from registration of its securities under Regulation 0 of the Scaurities Act of 1933? (c) It sets the private funds is form 0 fille number (it any): Form 0 fill number (2) If the answer funds is form 0 fille number (it any): Form 0 fill number (2) If the answer to question 23.(a)(1) is "yes," respond to questions (b) infraugh (it) below. If the private fund uses more than one auditing firm you must compete questions (b) infraugh (it) advises. If the private fund uses more than one auditing firm you must compete questions (b) through (it) expandidly far each auditing firm. Additional Auditor Information : 1 Record(s) Filled If the answer to question 23.(a)(1) is "yes," respond to questions (b) incough (it) active. If the private fund uses more than one auditing firm, you must compete questions (b) through (it) expandidly far each auditing firm. (a) Name or the auditing firm's office responsible for the private funds fund. (city, state and caunity): City City Control (it in a subject of the private funds funding firm an independent public company Accounting Oversign: Board-Assigned Number: (b) It has auditing firm an independent with the Pu	So Do any investment advisers (other than the investment advisers listed in Section 7.0. (1).A.3 (b)) advise the power fund? (b) (if the answer to question 18 (c) is "yes," provide the name and SRC file number, if any of the other advisers to the provide fund. If the answer to question 18 (a) is "no," leave this question blank. No Information Filed Yes, No. (a) (b) In the number of the provide deposition of the private fund. (c)	(b		r to	
(a) Do any investment advisers (other than the investment advisers listed in Section 7.8 (1) A.3 (9) advise the private rund? (b) If the answer to question 18 (a) is "per," provide the name and SUC till number, if any, of the other advisers to the private rund. If the answer to question 18 (a) is "no," leave this question blank. No Information Filed Yes And your dishes solicited to invest in the private fueds funds of the private fund. Approximately what percentage of your alterals has invested in the private fund. Approximately what percentage of your alterals has invested in the private fund. Approximately what percentage of your alterals has invested in the private fund. Approximately what percentage of your alterals has invested in the private fund. Approximately what percentage of your alterals has invested in the private fund. Approximately what percentage of your alterals has invested in the private fund. Yes If yes, provide the private fund's Form D file number (if any): Form D file number (2) If the private fund's Formatel fund's Form D file number (if any): Form D file number (2) If the private fund's Formatel is streaments surject in an annual audit? (a) (1) Are the private fund's Formatel is streaments surject in an annual audit? (b) If yes, provide the private fund's Formatel is streaments surject in an annual audit? (c) If the newser to question 23 (a)(1) is "yes," are the formately interesting private in recordance with U.S. GAAP? (d) If the answer to question 23 (a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) File for the private funds audit (city, state and country). (c) The location of the auditing firm's effice responsible for the private funds audit (city, state and country). (d) Is the auditing firm an independent public accountion? (e) Is the auditing firm an independent public a	(a) Do any investment advisers (other than the investment advisers listed in Section 7.6.(1).A. 3. (b)) advise the private fund? (b) If the answer thing question 18.(a) is "yes," provide the name and STC file number, it any, of the other advisers to the private fund. If the answer to question 18.(a) is "no." have this question blank. No Information Filed Yes Are your clients solicited to invest in the private fund? (c) Approximately what percentage of your clients has invested in the private fund? (d) Approximately what percentage of your clients has invested in the private fund? (e) Approximately what percentage of your clients has invested in the private fund? (f) (ii) Approximately what percentage of your clients has invested in the private fund? (iii) (iii)	a) Do any investment advisers (other than the investment advisers layed in Section 7.8.4) A (b)) advise the private Arm? (a) If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the order advisers to the private fund. If the answer to question 18.(b) is "no," leave this question blank. No Information Filed (b) (c) (c) (c) (d) (d) (e) (e) (f) (f) (f) (f) (f) (f		No Information Filed		
(b) If the possibility of the provide the provide the name and STC the number, if any, of the other advisers to the provide truck. If the possibility is not," lower this specifies shark. No Information Filed Yes No Information Filed Yes Are your clicans solicited to invest in the private fund? NOTE: For purposes of this question, do not consider fooder funds of the private fund? NOTE: For purposes of this question, do not consider fooder funds of the private fund? NOTE: For purposes of this question, do not consider fooder funds of the private fund? Yes I guestion the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? If yes, provide the private fund's financial statements suspect to an annual audit? (2) If the univer to question 23 (b)(1) is "yes," and the financial statements grepared in accordance with U.S. GAAP? (3) If the answer to question 23 (b)(1) is "yes," are the financial statements grepared in accordance with U.S. GAAP? (4) If the answer to question 33 (b)(1) is "yes," respond to questions (b) through (f) below. If the private fund axes more than 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 (b)(1) is "yes," respond to questions (b) through (f) 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's office responsible for the private funds audit (rity, state and country): City ChicAcco Hillians United States Yes No ChicAcco Hillians an adequated accountant? (c) Is the auditing firm registered with the Public Company Accounting Oversight Board-Assigned Number: 34 (d) Is the auditing firm as independent public accountant?	(a) If the present to question 18 (a) is "yes," provide the name and SEC file number. If any, of the other advisors to the prevate hand. If the arrive to question 18 (a) is "no." loans this question Mark. No information Filed Yes Are your clients solicited to invest in the private fund? Approximately what percentage of your clients has invested in the private fund? Approximately what percentage of your clients has invested in the private fund? As the private fund ever relied on an exemption from registration or its securities under Regulation D at the Securities Act of 1933? It yes provide the private fund's Form D file number (if uny): Form D file number (2) If the answer to question 28 (a)(1) is "yes," and the financial statements propered in accordance with U.S. GAAP? (a) (1) Are the private fund's financial extrements suspect to an annual audit? (b) If a prever to question 28 (a)(1) is "yes," and the financial statements propered in accordance with U.S. GAAP? (c) If the answer to question 31 (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 (c) through (f) separately for each auditing firm. Additional Additional Additional 31 (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) finningh (f) separately for each auditing firm. (c) Name of the auditing firm: DELOTITE & TOUGHE LIP (d) Is the additing firm an independent public accountant? (e) It has a additing firm an independent public accountant? (e) It has a additing firm an independent public accountant? (f) Is the auditing firm an independent public accountant? (g) Is the additing firm an independent public accountant? (g) It is the additing firm an independent public accountant?	of the prevention (18 (a)) is "yes." provides the name and SEC file number, if any, of the other advisers to the private fund. If the absent to question 18 (a) is "no." have this question blank. No Information Filed You May a governor should be a provided to invest in the private fund? (C) E. For purposes of this question, do not consider feeder funds of the private fund. (C) If the private fund ever relied on an exemption from registration of its securities under Hegulation D of the Securities Act of 1937? (E) Yes, provides the private funds from D tile number (flary): (C) Yes, provides the private funds from D tile number (flary): (C) If the answer to question 23 (a)(f) is "yes." are the fund of statements prepared in accordance with U.S. GAN? (E) If the answer to question 23 (a)(f) is "yes," are the funding firm. Additional Auditor Information 1 Records) Filed. If the answer to question 23 (a)(f) is "yes," respend to questions (b) through (f) below. If the private fund uses more than one auditing firm. Additional Auditor Information 1 Records) Filed. If the answer to question 23 (a)(f) is "yes," respend to questions (b) through (f) below. If the private fund uses more than one auditing firm. Additional Auditor Information 1 Records) Filed. If the answer to question 23 (a)(f) is "yes," respend to questions (b) through (f) below. If the private fund uses more than one auditing firm. (a) Namon of the auditing firms office responsible for the private runds audit (city, state and country): (b) If the location of the auditing firms office responsible for the private runds audit (city, state and country): (c) If the location of the auditing firm is office responsible for the private runds audit (city, state and country): (d) If the auditing firm or independent potable auditing for a private runds audit (city, state and country): (e) It he location of the auditing firm of the private fund Assigned Number: 4 (f) If yes, Public Company Accounting Counsign floard Assigned Number:			Ye	s
to question 18 (a) is "no." leave this question blank. No Information Filed Yes Are your <i>clients</i> solicited to invest in the <i>private fund?</i> Approximately what percentage of your <i>clients</i> has invested in the <i>private fund?</i> Ose In some of the private fund ever relies on an exemption from registration of its securities under Regulation 10 of the Securities and of 1933? If yes, provide the <i>private fund's</i> from D file number (if any). Form of the number of 1-20384 SERVICE PROVIDERS CITY of the private fund's financial statements subject to an annual audit? (a) (1) Are the private fund's financial statements subject to an annual audit? (b) If the answer to question 23 (a)(1) is "yes," respond to questions (b) through (b) below. If the private fund uses more than one auditing firm, you must complete questions (c) through (b) 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 (b) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. DELOTE a TOUCHE LLP (b) Name of the auditing firm: a material private ariticle responsible for the private auditing firm. DELOTE a TOUCHE LLP (c) It he available firm an independent public accounter? (d) Is the auditing firm an independent with the Public Company Accounting Oversight Board? (e) If yes, Public Company Accounting Oversight Board-Assigned Number: 3.4 10 if yes to ter, source, source, and auditing firm requestions with the Public Company Accounting Oversight Board-Assigned Number: 3.4 3.6 3.7 3.8 3.9 3.9 3.9 3.9 3.9 3.9 3.9	to question 18.(a) is "inc," leave this question blank. No Information Filed Yes Are your cleans solicited to Invest in the private fund? Approximately what percentage of your cleans has invested in the private fund? Approximately what percentage of your cleans has invested in the private fund? Note offering Yes Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? If yes, provide the private fund's from D file number (if any): Form D file number 001-209884 SERVICE PROVIDERS ditions Yes (a) (1) Are the private fund's financial statements subject to an annual audit? (b) (2) If the answer to question 23 (a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? (c) (1) Are the private fund's financial statements subject to an annual audit? (d) (1) Are the private fund's financial statements subject to an annual audit? (e) If the answer to question 23 (a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? (f) the answer to question 23 (a)(1) is "yes," are fine financial statements prepared in accordance with U.S. GAAP? (g) The answer to question 23 (a)(1) is "yes," are fine financial statements prepared in accordance with U.S. GAAP? (g) If the answer to question 23 (a)(1) is "yes," are fine financial statements prepared in accordance with U.S. GAAP? (g) 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. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23 (a) (f) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm go must complete questions (b) through (f) separately for each auditing firm. (g) In the auditing firm an independent public accountant? (g) If yes, Public Company Accounting Oversight Board Ass	to question 18 (a) is "no." have this question blank. No information Filed Yes, No regions definite solidated in invest in the private fund? 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Are your clicats solicited to invest in the private fund? Approximately what percentage of your clients has invested in the private fund? Approximately what percentage of your clients has invested in the private fund? ***********************************	Are your offents solicited to invest in the private fond? **NOTE: For purposes of this question, do not consider feeder funds of the private fund? **ONE*** One purposes of this question, do not consider feeder funds of the private fund? **ONE*** One purposes of this question, do not consider feeder funds of the private fund? **ONE*** One purposes of this question go of your clients has invested in the private fund? **Vested Offering** **Hes the private fund over rolled on an examption from registration of its securities under Regulation D of the Securities Act of 1933? **One Price number** **(021-207884** **ERVICE PROVIDERS** **Stationary** **(a) (1) Are the private fund's financial statements subject to an annual codit? **(a) (1) Are the private fund's financial statements subject to an annual codit? **(a) (1) Are the private fund's financial statements subject to an annual codit? **(a) (1) Are the private fund's financial statements subject to an annual codit? **(b) If the answer to question 23 (a) (1) is "yes," are the financial statements prepared in accordance with U.S. CAAP? **(c) If the answer to question 23 (a) (1) is "yes," are the financial statements prepared in accordance with U.S. CAAP? **(d) If the unswer to question 23 (a) (1) is "yes," are the financial statements prepared in accordance with U.S. CAAP? **(d) 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 (h) separately for each auditing firm. **(d) Additional Auditor Information : 1 Record(s) Filed. **(d) In the auditing firm an independent public accountant? **(e) If the auditing firm an independent public accountant? **(e) If the auditing firm an independent public accountant? **(e) Is the auditing firm an independent public accountant? **(e) Is the auditing firm an independent public accountant? **(e) If yes, Public Company Accou	Additional Auditor Information : 1 Record(s) Filed. Additional Auditor Information : 1 Record(s) Filed. Additional Auditor Information : 1 Record(s) Filed. The presence to question 23.(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm you must complete questions (c) through (f) separately for each auditing firm. Additional Auditor Information : 1 Record(s) Filed. (b) Nemo of the auditing firm of the complete questions (c) through (f) separately for each auditing firm. (c) If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm. Additional Auditor Information : 1 Record(s) Filed. (c) Nemo of the auditing firm port to auditing firm before the auditing firm. (d) Nemo of the auditing firm private funds (e) through (f) separately for each auditing firm. (e) Country: (f) In the answer to question 25.(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm yeu must complete questions (c) through (f) separately for each auditing firm. (g) Nemo of the auditing firm private funds (g) through (f) separately for each auditing firm. (g) It is the auditing firm private funds (g) through (f) separately for each auditing firm. (g) It is the auditing firm an independent public accountancy: (g) It is the auditing firm of the auditing firm's office responsible for the private funds until (dily, visite and country): (g) It is the auditing firm an independent public accountancy: (g) It is the auditing firm cogletered with the Public Company Accounting Oversight Beard? (g) It is the auditing firm to the auditing firm's cogletered with the public Company Accounting Oversight Beard? (g) It is the auditing firm to the auditing firm's cogletered with the public Company Accounting Oversight Beard? (g) It is the auditing firm to the auditing firm's cogletered to regular its pecunion by the Public Company Accounting	(b		ans	we
Are your clients solicited to invest in the private funds of the private fund. Approximately what percentage of your clients has invested in the private fund? Approximately what percentage of your clients has invested in the private fund? Was Ciffering Las the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? Example 1 of the number Vers Vers Vers Types provide the private funds form D file number (if any): Form D file number Vers Vers Only 1 of the private funds financial statements subject to an annual audit? (a) (1) Are the private funds financial statements subject to an annual audit? (b) If the answer to question 23 (a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(c) Filed. If the answer to question 23 (a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) below. If the private fund uses more than one auditing firm, you must pust fund 23 (a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. ELECTIFICATION (b) It is "yes," respond to questions (b) through (f) below. If the private fund uses more than one auditing firm. ELECTIFICATION (b) It is private funds solid (a) the private fund uses more than one auditing firm. ELECTIFICATION (c) It is private funds solid (a) the private fund uses more than one auditing firm. ELECTIFICATION (c) It is private funds solid (a) the private funds funds (a) the private funds (a) the private funds (a) the priva	Are your clients solicited to invest in the private fund? ### ADDE: Lor purposes of rois question, do not consider feeder funds of the private fund? #### ADDE: Lor purposes of rois question, do not consider feeder funds of the private fund? ##### ADDE: Lor purposes of rois question, do not consider feeder funds of the private fund? ###################################	To previous claims solicited to invest in the private funds of the private fund provided that previous of this guestion, do not consider feeder funds of the private fund? (a) The provided the private funds of your olicitis has invested in the private fund? (b) The private fund even relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? (c) Types, provided the private fund of Form D file number (if uny). (c) Types, provided the private fund's Form D file number (if uny). (c) If the number private fund is financial statements subject to an annual audit? (c) If the answer of question 23 (a)(1) is "yes," are the financial statements propered in accordance with U.S. GAAP? (d) If the answer of question 23 (a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one auditing firm, your must complete questions (c) 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 (c) 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 (c) through (f) separately for each auditing firm. (d) Name of the auditing firm of the private funds audit (atty, state and country). City: (e) The location of the auditing firm's office responsible for the private fund's audit (atty, state and country). City: (f) The location of the auditing firm's office responsible for the private fund's audit (atty, state and country). (e) It yes, Public Company Accounting Oversign1 Board? (f) It yes, Public Company Accounting Oversign1 Board? (g) It yes, Public Company Accounting Oversign1 Board Accountry one public Accountry		No Information Filed		
Approximately what percentage of your <i>clients</i> has invested in the <i>private fund?</i> Approximately what percentage of your <i>clients</i> has invested in the <i>private fund?</i> Approximately what percentage of your <i>clients</i> has invested in the <i>private fund?</i> You could be a private of the private fund over relicit on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? If yes, provide the <i>private fund's</i> Firm D file number (if any): Form D file number (27) If the invested fund's financial statements subject to an unroul updit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? (3) If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than 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 (f) 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 DELOTTE & TOUCHE LIP (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City CHICAGO III in the content public accountance? (a) It she auditing firm an <i>independent public accountance?</i> (b) Is the auditing firm registered with the Public Company Accounting Oversight Board? (c) It less public Company Accounting Oversight Hoard Assigned Number: 34	NOTE: For purposes of this question, do not consider feeder funds of the private fund? Approximately what percentage of your clients has invested in the private fund? Yes Has the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? If yes, provide the private Anal's Form D file number (if any): Form D file number (201-209884 (2) (1) Are the private fund's financial statements subject to an annual audit? (2) If the enswer to question 23 (a)(1) is "yes," are the financial statements propered in accordance with U.S. GAAP? (3) (1) Are the private fund's financial statements subject to an annual audit? (4) (2) If the enswer to question 23 (a)(1) is "yes," respond to questions (a) through (b) below. If the private fund uses more than one auditing firm you must complete questions (b) through (b) paperately for each auditing firm. Additional Auditor information: 1 Record(s) Filed. If the answer to question 33 (a)(1) is "yes," respond to questions (b) through (b) 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: DELOITTE is TOUCHE LLP (c) The location of the auditing firms office responsible for the private fund's audit (city, state and country) City: CITICASD (d) Is the auditing firm un independent public accountant? (e) Is the auditing firm un independent public accountant? (f) Is the auditing firm un independent public accountant? (g) Is the auditing firm un independent public accountant? (g) Is the auditing firm un independent public accountant? (g) Is the auditing firm un independent public accountant?	pproximately what percentage of your clears has invested in the private hand? **Technical States** **Technic			Ye	s
Approximately what percentage of your clients has invested in the private fund? **O%** **Vest Offering** **Hes the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? **If yes, provide the private fund's Form D file number (if any): Form D file number	Approximately what percentage of your clients has invested in the private fund? Oxide Value Offering Ves Liss the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? If yes, provide the private fund's form 0 tillo number (if any): Form D file number [021-209884 FRO/ICE PROVIDERS Stores (a) (1) Are the private fund's financial statements subject to an annual audit? (b) If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (ft) below. If the private fund uses more than one auditing firm you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information : 1 Record(s) Floring (ft) separately for each auditing firm. Additional form, you must complete questions (b) through (ft) separately for each auditing firm. (b) Name of the auditing firm surface funds of the private fund's audit (city, state and country): City State: Cunity: City State: Cunity: City State auditing firm an independent public accountant? (c) Is the auditing firm an independent public accountant? (d) Is the auditing firm registered with the Public Company Accounting Oversight Board? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? (ft yes, Public Company Accounting Oversight Board-Assigned Number: 34	proximately what percentage of your clients has invested in the private fund? ** ** ** ** ** ** ** ** **	Ar	re your clients solicited to invest in the private fund?	•)
Additional Auditor Information : 1 Record(s) Filed. If the answer to question 23 (a)(1) is "yes," respond to questions (b) through (r) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (r) separately for each auditing firm. Oblimate to question 23 (a)(1) is "yes," respond to questions (b) through (r) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (r) 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 (r) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (r) separately for each auditing firm. Additional Auditor Information : 1 Record(s) Filed. If the answer to question 22 (a)(1) is "yes," respond to questions (b) through (r) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (r) separately for each auditing firm. Oblimate of the auditing firm: DELOTTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: CHICAGO (d) Is the auditing firm an independent public accountant? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? O CITY (PS) Public Company Accounting Oversight Board-Assigned Number: 34	Wate Offering Has the <i>private fund</i> ever relied on an exemption from registration of its securities under Regulation b of the Securities Act of 1933? © If yes, provide the <i>private fund</i> 's Form b file number (if any): Form b file number 021-299884 ERVICE PROVIDERS ### The private fund's financial statements subject to an annual audit? © (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? © If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? © If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? © 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. #### DELOITE a TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: State: Country: United States Yes f (d) Is the auditing firm an independent public accountant? (e) If the auditing firm registered with the Public Company Accounting Oversight Board? If yes, Public Company Accounting Oversight Board-Assigned Number: 34	to Offering Its the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? It yes, provide the private fund's form D rile number (if any): Form D file number VICE PROVIDERS OTS VICE PROVIDERS OTS (2) If the answer to question 23. (a) (1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? (3) If the answer to question 23. (a) (1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? (4) If the answer to question 23. (a) (1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? (5) If the answer to question 23. (a) (1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than 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 (f) below. If the private fund uses more than one auditing firm, you must complete questions (a) through (f) separately for each auditing firm. (b) Name of the auditing firm's office responsible for the private fund's audit (city, state and country): (city: State: Country: City: Country: City: State: Country: City: State: Country: (d) Is the auditing firm an independent public accountant? (e) If yes, Public Company Accounting Oversight Board-Assigned Number: 34 U.I. "Yes To (e) auditing Coversight Board-Assigned Number: 34 U.I. "Yes To (e) auditing Coversight Board-Assigned Number: 34 U.I. "Yes To (e) auditing Coversight Board in accordance with its rules? Ves No	Ν	OTE: For purposes of this question, do not consider feeder funds of the private fund.		
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? If yes, provide the <i>private fund</i> 's Form D file number (if any): Form D file number (2011-209884 ERVICE PROVIDERS dittors (a) (1) Are the <i>private fund</i> 's financial statements subject to an annual audit? (b) The answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? (c) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? (d) If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (t) below. If the <i>private fund</i> was more than 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 (f) 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's office responsible for the <i>private fund</i> 's audit (city, state and country): (city: State: Country: (d) Is the auditing firm an <i>independent public</i> accountant? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? (f) If yes, Public Company Accounting Oversight Board-Assigned Number: 3.4	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? If yes, provide the <i>private fund</i> 's Form D file number (if any): Form D file number 021-209884 FREVICE PROVIDERS (a) (1) Are the <i>private fund</i> 's financial statements subject to an annual audit? (b) If the answer to question 23 (a) (1) is "yes," are the financial statements prepared in accordance with U.S. CAAP? (c) If the answer to question 23 (a) (1) is "yes," are the financial statements prepared in accordance with U.S. CAAP? (d) If the answer to question (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 (f) below. If the <i>private fund</i> uses more than one auditing firm. Additional Auditor Information : 1 Record(s) Filed. If the answer to question 23 (a) (1) is "yes," respond to questions (b) through (f) 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's office responsible for the <i>private fund</i> 's audit (city, state and country): City: CHICAGO III inois United States Yes I (d) Is the auditing firm an independent public accountant? (e) If yes, Public Company Accounting Oversight Board-Assigned Number: 34	Additional Auditor Information : 1 Record(s) Filed. If the answer to question 23 (a)(1) is "yes," respond to questions (b) through (b) below. If the private fund uses more than 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 (b) below. If the private fund uses more than one auditing firm. Additional Auditor Information : 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (b) below. If the private fund uses more than one auditing firm. Additional Auditor Information : 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (b) below. If the private fund uses more than one auditing firm, you must complete questions (b) through (b) separately for each auditing firm. DELOTTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City CHICAGO Illinois United States Yes No (d) Is the auditing firm an independent public company Accounting Oversight Board? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? (f) yes, Public Company Accounting Oversight Board-Assigned Number: 34 (i) it yes, to (e) accove, is the auditing firm's Sudject to request inspection by the Public Company Accounting Oversight Board-Assigned Number: 34 (ii) it yes to (e) accove, is the auditing firm Sudject to request inspection by the Public Company Accounting Oversight Board-Assigned Number: 35 Yes In Sudject Company Accounting Oversight Board-Assigned Number:				
If yes, provide the private fund's Form D file number (if any): Form D file number College	Has the private fund ever rolled on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? If yes, provide the private fund's Form D file number (if any): Form D file number	Is the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933? (a) (1) Are the private fund's form D file number (if any): (b) (1) Are the private fund's financial statements subject to an annual audit? (c) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? (d) If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (f) below. If the private fund uses more than 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 (f) below. If the private fund uses more than one auditing firm, you must complete questions (c) through (f) separately for each auditing firm. DELOITTE & TOUCHE LIP (c) The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: CHICAGO IIInols United States Yes No (d) Is the auditing firm an independent public accountant? (e) C If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (v) If you not considered accounting minimage of the responsibility of private company accounting oversight Board? Ves III.	vat	te Offering		
Form D file number College Col	If yes, provide the <i>private fund's</i> Form D file number (if any): Form D file number	Fyes, provide the private fund's form D file number (if any): **Porm D file number** **D21:209884* **VICE PROVIDERS** **OTS** **Provide fund's financial statements subject to an annual audit?* **(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?			Ye	s l
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If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (i) It yes to (e) above, is the additing inthi subject to regular inspection by the Public Company Accounting Oversight Board in	If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (i) It yes to (e) above, is the additing firm subject to regular inspection by the Public Company Accounting Oversight Board in	If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (i) If yes to (e) above, is the additing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? Yes No. As the private fund's audited financial statements for the most recently completed financial statements.		a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: State: Country: CHICAGO Illinois United States	og firn	m,
If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (i) It yes to (e) above, is the additing nimi subject to regular inspection by the Public Company Accounting Oversight Board in	If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (i) It yes to (e) above, is the additing firm subject to regular inspection by the Public Company Accounting Oversight Board in	If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (i) If yes to (e) above, is the additing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? Yes No. As the private fund's audited financial statements for the most recently completed financial statements.		a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: State: Country: CHICAGO Illinois United States	Yes	No.
(i) If yes to (e) above, is the additing him subject to regular inspection by the Public Company Accounting Oversight Board in	(i) It yes to (e) above, is the additing him subject to regular inspection by the Public Company Accounting Oversight Board in	(i) If yes to (e) above, is the additing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? Yes N		a) (1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: State: Country: CHICAGO Illinois United States	Yes	No.
(i) II yes to (e) above, is the additing him subject to regular inspection by the Public Company Accounting Oversight Board in	(i) II yes to (e) above, is the additing him subject to regular inspection by the Public Company Accounting Oversight Board in	(i) If yes to (e) above, is the additing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? Yes N		(1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: City: State: Country: CHICAGO Illinois United States (d) Is the auditing firm an <i>independent public accountant?</i>	ong firm	No.
(1) II yes to (e) above, is the additing him subject to regular inspection by the Public Company Accounting Oversight board in	(i) II yes to (e) above, is the additing him subject to regular inspection by the Public Company Accounting Oversight Board in	(i) If yes to (e) above, is the additing firm subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules? Yes N		(1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: City: State: Country: CHICAGO Illinois United States (d) Is the auditing firm an <i>independent public accountant?</i>	ong firm	No.
		Yes No. Are the private fund's audited financial statements for the most recently completed financial year distributed to the private fund's		(1) Are the <i>private fund</i> 's financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: State: Country: CHICAGO Illinois United States (d) Is the auditing firm an <i>independent public accountant</i> ? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? If yes, Public Company Accounting Oversight Board-Assigned Number:	ong firm	No.
		a) Are the private fund's audited financial statements for the most recently completed fixed year distributed to the private fund's		(1) Are the <i>private fund</i> 's financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund</i> 's audit (city, state and country): City: State: Country: CHICAGO Illinois United States (d) Is the auditing firm an <i>independent public accountant</i> ? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? If yes, Public Company Accounting Oversight Board-Assigned Number:	ong firm	No.
	Yes	a) Are the private fund's audited financial statements for the most recently completed fixed year distributed to the private fund's		(1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: State: Country: CHICAGO Illinois United States (d) Is the auditing firm an <i>independent public accountant</i> ? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (i) If yes to (e) above, is the auditing firm subject to regular inspection by the rubic company Accounting Oversight Board in the rubic account in the rubic account in the ru	ong firm	No.
Yes		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>		(1) Are the <i>private fund's</i> financial statements subject to an annual audit? (2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing you must complete questions (b) through (f) separately for each auditing firm. Additional Auditor Information: 1 Record(s) Filed. If the answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the <i>private fund</i> uses more than one auditing firm, you must complete questions (b) through (f) separately for each auditing firm. (b) Name of the auditing firm: DELOITTE & TOUCHE LLP (c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: State: Country: CHICAGO Illinois United States (d) Is the auditing firm an <i>independent public accountant</i> ? (e) Is the auditing firm registered with the Public Company Accounting Oversight Board? If yes, Public Company Accounting Oversight Board-Assigned Number: 34 (i) If yes to (e) above, is the auditing firm subject to regular inspection by the rubic company Accounting Oversight Board in the rubic account in the rubic account in the ru	Yes •	No C

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

	yes," respond to questions er, you must complete ques	(b) through (e) below for each prime broker the <i>private fund</i> uses. If the stions (b) through (e) separately for each prime broker. No Information Filed	Yes O ne <i>privat</i>
f the answer to question 24.(a) is " und uses more than one prime brok	yes," respond to questions er, you must complete ques	stions (b) through (e) separately for each prime broker.	
<u>l</u>	N	lo Information Filed	
1			
f the answer to question 25.(a) is "	yes," respond to questions	orokers listed above) to hold some or all of its assets? (b) through (g) below for each custodian the <i>private fund</i> uses. If the <i>p</i> ons (b) through (g) separately for each custodian.	Yes orivate
Additional Custodian Information	: 1 Record(s) Filed.		
•	n, you must complete quest	ns (b) through g) below for each custodian the <i>private fund</i> uses. If the tions (b) through (g) separately for each custodian.	private
(c) Primary business name of cus THE NORTHERN TRUST COMPA			
City:	State:	ody of the private fund's assets (city, state and country): Country:	
CHICAGO	Illinois	United States	Yes No
(e) Is the custodian a related pers	on or your firm?		0 @
(f) If the custodian is a broker-de	aler, provide its SEC registr	ation number (if any):	
CRD Number (if any):			
(g) If the custodian is not a broke identifier (if any)	er-dealer, or is a broker-dea	aler but does not have an SEC registration number, provide its <i>legal ent</i>	ity
<u>rator</u>			Yes
•	yes," respond to questions	(b) through (f) below. If the <i>private fund</i> uses more than one administr	⊙ ator, yo
nust complete questions (b) through Additional Administrator Informat		ministrator.	
Additional Administrator Informati	norr. T Record(s) Thed.		
	s "yes," respond to questior	ns (b) through (f) below. If the <i>private fund</i> uses more than one	
If the answer to question 26.(a) is administrator, you must complete	questions (b) through (f) se	eparately for each administrator.	
•	questions (b) through (f) so	eparately for each administrator.	

State:

Country:

City:

		Yes	s No	
		(d) Is the administrator a <i>related person</i> of your firm?	\odot	
		(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."		
	L			
27		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 an administrator, that is related person?	s not	
	Inclurelev	ude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including obtaining ar vant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (includ cations) was the valuation determined by such <i>person</i> .	-	
Ma	ırkete	<u>ers</u>		
28	(a) I	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	Yes I	
20	9	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicito similar <i>person</i> . If the answer to question 28.(a) is "yes," respond to questions (b) through (g) below for each such marketer the <i>private</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.	r, or	•
		No Information Filed		
A. F	PRIVAT	TE FUND		_
Info	ormati	ion About the <i>Private Fund</i>		
1.		Name of the <i>private fund</i> : AXIOM INVESTORS TRUST II (AXIOM U.S. SMALL CAP EQUITY FUND)		
	(b)	Private fund identification number:		
		(include the "805-" prefix also) 805-7030121740		
2	Unda	or the laws of what state or country is the private fund erganized.		
2.		er the laws of what state or country is the <i>private fund</i> organized: State: Country:		
		Delaware United States		
3.	(a) I	Name(s) of General Partner, Manager, Trustee, or Directors (or <i>persons</i> serving in a similar capacity):		
		me of General Partner, Manager, Trustee, or Director		
	AXI	OM INVESTORS LLC		
	<i>(</i> 1. <i>)</i>			
	(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		
		No finormation riled		
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		
	V	(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		
6.	(a) !	Is this a "master fund" in a master-feeder arrangement?	Yes N	_
Ο.		If yes, what is the name and <i>private fund</i> identification number (if any) of the feeder funds investing in this <i>private fund</i> ?	0	⊙

Illinois

United States

CHICAGO

		Yes	s 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 <i>private fund</i>:	0	0
	Private fund identification number: (include the "805-" prefix also)		
	NOTE: You must complete question 6 for each master-feeder arrangement regardless of whether you are filing a single Schedule D, Section for the master-feeder arrangement or reporting on the funds separately.	ı 7.B.	(1)
7.	If you are filing a single Schedule D, Section 7.B.(1) for a master-feeder arrangement according to the instructions to this Section 7.B.(1), for the feeder funds answer the following questions:	or eac	ch of
	No Information Filed		
	NOTE: For purposes of questions 6 and 7, in a master-feeder arrangement, one or more funds ("feeder funds") invest all or substantially a assets in a single fund ("master fund"). A fund would also be a "feeder fund" investing in a "master fund" for purposes of this question if it multiple classes (or series) of shares or interests, and each class (or series) invests substantially all of its assets in a single master fund.		
		Yes	s No
8.	(a) Is this <i>private fund</i> a "fund of funds"? NOTE: For purposes of this question only, answer "yes" if the fund invests 10 percent or more of its total assets in other pooled investment vehicles, regardless of whether they are also <i>private funds</i> or registered investment companies.	nt O	•
	(b) If yes, does the <i>private fund</i> invest in funds managed by you or by a <i>related person</i> ?	0	0
9.	During your last fiscal year, did the <i>private fund</i> invest in securities issued by investment companies registered under the Investment Company Act of 1940 (other than "money market funds," to the extent provided in Instruction 6.e.)?	Yes O	s No ⊙
10.	What type of fund is the private fund?		
	O hedge fund O liquidity fund O private equity fund O real estate fund O securitized asset fund O venture capital fund O Other privations only EQUITY FUND	ate fu	ınd:
	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> : \$ 18,911,985		
<u>Ow</u>	<u>vnership</u>		
12.	Minimum investment commitment required of an investor in the <i>private fund</i> : \$ 5,000,000		
	NOTE: Report the amount routinely required of investors who are not your <i>related persons</i> (even if different from the amount set forth in th organizational documents of the fund).	е	
13.	Approximate number of the <i>private fund's</i> beneficial owners: 20		
14.	What is the approximate percentage of the <i>private fund</i> beneficially owned by you and your <i>related persons</i> : 59%		
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	S No

No Information Filed

ur A	dvisor	y Services		
			Ye	s ľ
) If the	ou a subadviser to this <i>private fund?</i> answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund.</i> If the answind is "no," leave this question blank.	ver to	
		No Information Filed		
			Ye	s I
) If the	ny investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the <i>private fund?</i> E answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the estion 18.(a) is "no," leave this question blank.	he ans	
		No Information Filed		
			Ye	s I
Ar	e your	clients solicited to invest in the private fund?	•	
N	OTE: Fo	r purposes of this question, do not consider feeder funds of the private fund.		
Α¢	•	ately what percentage of your <i>clients</i> has invested in the <i>private fund</i> ?		
<u>/at</u>	e Offer	<u>ing</u>	Ye	s I
На	as the μ	private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	•	
lf	yes, pr	ovide the <i>private fund's</i> Form D file number (if any):		
F	orm D f			
ER\	/ICE PR	16	Ye	s
ER\	/ICE PR <u> </u>	OVIDERS re the <i>private fund's</i> financial statements subject to an annual audit?	Ye ©	
ER\	/ICE PR /rs) (1) A (2) If	OVIDERS The the private fund's financial statements subject to an annual audit? The answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	©)
ER\	/ICE PR ors) (1) A (2) If	OVIDERS re the <i>private fund's</i> financial statements subject to an annual audit?	©)
SER\	ICE PR (1) A (2) If If the your	OVIDERS The the private fund's financial statements subject to an annual audit? If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? If answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one audit	©)
ER\	(ICE PR (1) A (2) If If the your Addi	OVIDERS The the private fund's financial statements subject to an annual audit? The answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? The answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one audit nust complete questions (b) through (f) separately for each auditing firm.	©)
ER\	(ICE PR (1) A (2) If If the your Addi	oviders The the private fund's financial statements subject to an annual audit? The answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? The answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one audit nust complete questions (b) through (f) separately for each auditing firm. Tional Auditor Information: 1 Record(s) Filed. The answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one	©)
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ER\	(ICE PR (1) A (2) If If the your Addi (b)	DVIDERS The the private fund's financial statements subject to an annual audit? The answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? The answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one audit nust complete questions (b) through (f) separately for each auditing firm. The answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one litting firm, you must complete questions (b) through (f) separately for each auditing firm. Name of the auditing firm: DELOITTE & TOUCHE LLP The location of the auditing firm's office responsible for the private fund's audit (city, state and country):	©) m,
ER\	(ICE PR (1) A (2) If If the your Addi (b) (c)	DOVIDERS The the private fund's financial statements subject to an annual audit? The answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP? The answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one audit neuts complete questions (b) through (f) separately for each auditing firm. The answer to question 23.(a)(1) is "yes," respond to questions (b) through (h) below. If the private fund uses more than one aliting firm, you must complete questions (b) through (f) separately for each auditing firm. Name of the auditing firm: DELOITTE & TOUCHE LLP The location of the auditing firm's office responsible for the private fund's audit (city, state and country): City: State: Country:	ting fir	N.
ER\	(ICE PR (1) A (2) If If the your Addi (b) (c)	The location of the auditing firm: DELOITTE & Touches fund's office responsible for the private fund's audit (city, state and country): City: State: Country: City: State: Country: CHICAGO IIIInois Litonal Auditor Stinancial statements subject to an annual audit? In the private fund's financial statements prepared in accordance with U.S. GAAP? In annual accordance with U.S. GAAP? In accor	ting fir) m,
ER\	(ICE PR (1) A (2) If If the your Addi (b) (c)	The location of the auditing firm: DELOITE & Touche Lip The location of the auditing firm: DELOITE & Touche Lip The location of the auditing firm's office responsible for the private fund's audit (city, state and country): CHICAGO III in independent public accountant?	Yes	N

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

(9)	investors?	icial statements for the most re	scently completed fiscal year distributed to the private rand's	• 0
(h)	Do all of the reports prepared by t	he auditing firm for the <i>private</i>	fund since your last annual updating amendment contain unqualified	d opinions?
	⊙ Yes O No O Report Not Yet R	eceived		
	If you check "Report Not Yet Receiv	ed," you must promptly file an ai	mendment to your Form ADV to update your response when the repor	rt is available.
<u>Prime</u>	<u>Broker</u>			
				Yes No
24. (a)	Does the <i>private fund</i> use one or n	•	> through (s) holour for each prime broken the private fundings.	C G
	•		b) through (e) below for each prime broker the <i>private fund</i> uses. If ions (b) through (e) separately for each prime broker.	r the <i>private</i>
		No	Information Filed	
Custod	l <u>ian</u>			
25 (2)	Doos the private funduce any cust	radians (including the prime bro	okers listed above) to hold some or all of its assets?	Yes No
25. (a,	,		b) through (g) below for each custodian the <i>private fund</i> uses. If th	• private
	•	•	s (b) through (g) separately for each custodian.	,
	Additional Custodian Information	n : 1 Record(s) Filed.		
	(b) Legal name of custodian: THE NORTHERN TRUST COME		ons (b) through (g) separately for each custodian.	
	(c) Primary business name of co			
	(d) The location of the custodian	n's office responsible for <i>custod</i>	ly of the <i>private fund's</i> assets (city, state and country):	
	City:	State:	Country:	
	CHICAGO	Illinois	United States	Yes No
	(e) Is the custodian a related pe	erson of your firm?		0 0
	(f) If the custodian is a broker-	dealer, provide its SEC registrat	tion number (if any):	
	-	, μ		
	CRD Number (if any):			
	(g) If the custodian is not a bro identifier (if any)	ker-dealer, or is a broker-deale	er but does not have an SEC registration number, provide its <i>legal</i> e	entity
Admin	istrator			V N
26. (a)	Does the <i>private fund</i> use an admi	nistrator other than your firm?		Yes No
. /	•	•	o) through (f) below. If the <i>private fund</i> uses more than one admini	~ ~
	must complete questions (b) throu	ıgh (f) separately for each adm	inistrator.	

If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the private fund uses more than one

administrator, you must complete questions (b) through (f) separately for each administrator.

Additional Administrator Information : 1 Record(s) Filed.

(b) Name of administrator:

Yes No

		(c) Location of administrat	or (city, state and country):		
		City:	State:	Country:	
		CHICAGO	Illinois	United States	
		(d) le the administrator o	related person of your firm?		Yes No
		(d) Is the administrator a	elated person of your firm?		0 0
		(e) Does the administrator	prepare and send investor account s	atements to the <i>private fund's</i> investors?	
		Yes (provided to all	investors) $ar{\mathbb{C}}$ Some (provided to some	but not all investors) $_{f C}$ No (provided to no	investors)
		(f) If the answer to quest	on 26.(e) is "no" or "some," who send	s the investor account statements to the (rest of the) private fund's
		investors? If investor a	ccount statements are not sent to the	(rest of the) private fund's investors, response	and "not applicable."
27.	_		percentage of the private fund's asset	s (by value) was valued by a <i>person</i> , such a	as an administrator, that is not
	•	elated person?			
	100%		// · · · · · · · · · · · · · · · · · ·		
		•	•	on procedure established for that asset, if a ascriptions, redemptions or distributions, ar	
		ions) was the valuation de	·	oscriptions, reachiptions of distributions, at	id fee calculations (including
			,		
Mar	rketers				
					Yes No
28.	(a) Do	oes the <i>private fund</i> use the	services of someone other than you of	or your <i>employees</i> for marketing purposes?	0 ⊙
	Yo	u must answer "yes" whet	her the <i>person</i> acts as a placement ag	ent, consultant, finder, introducer, municipa	al advisor or other solicitor, or
		•		questions (b) through (g) below for each s	•
	US	es. If the <i>private fund</i> uses	more than one marketer you must co	nplete questions (b) through (g) separately	for each marketer.
			No Ir	formation Filed	
. PF	RIVATE I	FUND			
nfo	rmation	n About the <i>Private Fund</i>			
1.	(a) Na	ame of the <i>private fund</i> :			
	AX	(IOM OFFSHORE OPPORTUN	ITY FUND LP		
	` '	ivate fund identification nun			
		nclude the "805-" prefix als	o)		
	80	5-2518875896			
2	م مام م	the laws of what state on			
۷.			country is the <i>private fund</i> organized:		
	Sta	ate:	Country: Cayman Islands		
3.	(a) Na	ame(s) of General Partner,	Manager, Trustee, or Directors (or <i>per</i> s	cons serving in a similar capacity):	
		of General Partner, Mana			
		// INVESTORS LLC			
	(b) If f	filing an <i>umbrella registratio</i>	n, identify the <i>filing adviser</i> and/or <i>rely</i>	ing adviser(s) that sponsor(s) or manage(s)	this private fund
		Timing an armorona registration		rmation Filed	tins private rana.
			NO IIIIO	Thation Fried	
	T'				
4.			oply; you must check at least one):	ony under costice 2/2/4) -5+1	t Company Act of 1040
		·	·	any under section 3(c)(1) of the Investment	. •
	(2)	y quaimes for the exclusion	from the definition of investment comp	any under section 3(c)(7) of the Investmer	n Company Act of 1940
5	ic+ +b-	o name and country in Fra	ulich of each foreign financial regulator	authority with which the private fund is req	istored
J.	1151 [[]6	e dame and connicy. In End	uisi - oi each <i>ioreidh linandal feolliator</i>)	caudious vivid which the <i>brivate timo</i> is fed	ISTELLED

No Information Filed

THE NORTHERN TRUST COMPANY

6.	(a) Is this a "master fund" in a master-feeder arrangement?		•	0
	(b) If yes, what is the name and <i>private fund</i> identification number			
	Name of private fund	Private fund identification number		
	AXIOM OFFSHORE OPPORTUNITY FUND LTD	805-6445000245		
			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	r (if any) of the master fund in which this <i>private fund</i> invests?	~	
	Name of <i>private fund</i> :			
	Private fund identification number:			
	(include the "805-" prefix also)			
	NOTE: You must complete question 6 for each master-feeder arra for the master-feeder arrangement or reporting on the funds separate of the separate of the funds separate of the	ingement regardless of whether you are filing a single Schedule D, Sectionarately.	on 7.B.	(1)
7.		feeder arrangement according to the instructions to this Section 7.B.(1),	for eac	h of
	the feeder funds answer the following questions:			
	No	o Information Filed		
	assets in a single fund ("master fund"). A fund would also be a "fe	angement, one or more funds ("feeder funds") invest all or substantially eeder fund" investing in a "master fund" for purposes of this question if (or series) invests substantially all of its assets in a single master fund.		
			Yes	No
8.	(a) Is this <i>private fund</i> a "fund of funds"?			⊙
	NOTE: For purposes of this question only, answer "yes" if the functive vehicles, regardless of whether they are also <i>private funds</i> or regi	d invests 10 percent or more of its total assets in other pooled investment companies	ent	
	(b) If yes, does the <i>private fund</i> invest in funds managed by you of		0	0
			Yes	. No
9.	During your last fiscal year, did the private fund invest in securities	s issued by investment companies registered under the Investment	0	•
	Company Act of 1940 (other than "money market funds," to the ex-	xtent provided in Instruction 6.e.)?		
10	What type of fund is the <i>private fund</i> ?			
10.			, , ,	,
	heage fund V liquidity fund V private equity fund V real est	rate fund $^{f C}$ securitized asset fund $^{f C}$ venture capital fund $^{f C}$ Other $\it pri$	vate fui	na:
	NOTE: For definitions of these fund types, please see Instruction	6 of the Instructions to Part 1A.		
11.	Current gross asset value of the private fund:			
	\$ 5,722,849			
Οw	nership			
<u> </u>	<u></u>			
12.	Minimum investment commitment required of an investor in the pro-	ivate fund:		
	\$ 1,000,000			
	NOTE: Report the amount routinely required of investors who are organizational documents of the fund).	not your related persons (even if different from the amount set forth in t	:he	
	organizational documents of the fund).			
13.	Approximate number of the <i>private fund's</i> beneficial owners:			
	5			
14.	What is the approximate percentage of the <i>private fund</i> beneficiall	y owned by you and your related persons:		
	23%			
15	(a) What is the approximate percentage of the <i>private fund</i> benef	icially owned (in the aggregate) by funds of funds:		
٠.	0%	January Lyndings Contained		

Yes No

			Yes	No
	(b)	If the private fund qualifies for the exclusion from the definition of investment company under section 3(c)(1) of the Investment Company Act of 1940, are sales of the fund limited to <i>qualified clients</i> ?	•	0
16.	Wha	at is the approximate percentage of the <i>private fund</i> beneficially owned by non- <i>United States persons</i> :		
You	ur Ac	lvisory Services		
			Yes	No
17.	(a)	Are you a subadviser to this <i>private fund</i> ?	0	\odot
	(b)	If the answer to question 17.(a) is "yes," provide the name and SEC file number, if any, of the adviser of the <i>private fund</i> . If the answer question 17.(a) is "no," leave this question blank.	to	
		No Information Filed		
			Yes	No
18.		Do any investment advisers (other than the investment advisers listed in Section 7.B.(1).A.3.(b)) advise the private fund?	0	\odot
	(b)	If the answer to question 18.(a) is "yes," provide the name and SEC file number, if any, of the other advisers to the <i>private fund</i> . If the to question 18.(a) is "no," leave this question blank.	ansv	ver
		No Information Filed		
			Yes	No
19.		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.		proximately what percentage of your clients has invested in the private fund?		
	0%			
Pri	vate	Offering		
			Yes	No
21.	Has	the private fund ever relied on an exemption from registration of its securities under Regulation D of the Securities Act of 1933?	0	•
22.	If y	es, provide the <i>private fund's</i> Form D file number (if any):		
		No Information Filed		
D C	ED\/I	CE PROVIDERS		
В. 5	ERVI	CE PROVIDERS		
Aud	ditors			
0.0			Yes	s No
23.	(a)	(1) Are the <i>private fund's</i> financial statements subject to an annual audit?(2) If the answer to question 23.(a)(1) is "yes," are the financial statements prepared in accordance with U.S. GAAP?	•	0
		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	. ⊙ n firm	n O
		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:		
		DELOITTE & TOUCHE LLP		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country):		
		(c) The location of the auditing firm's office responsible for the <i>private fund's</i> audit (city, state and country): City: Country:		
		CHICAGO Illinois United States	•	_
			es	
		(2, 12 m. 22am.g m. a. maspanam pasno accountant.	•	
		(e) Is the auditing firm registered with the Public Company Accounting Oversight Board?	•	0
		If yes, Public Company Accounting Oversight Board-Assigned Number:		
		34		

				Ye
	are the <i>private fund's</i> audited financial stat nvestors?	ements for the most recently com	pleted fiscal year distributed to the private fund's	•
D	Oo all of the reports prepared by the audit	ing firm for the private fund since	your last <i>annual updating amendment</i> contain unqualifi	ed opinio
6	Yes ○ No ○ Report Not Yet Received			
It	f you check "Report Not Yet Received," you	must promptly file an amendment	to your Form ADV to update your response when the rep	ort is ava
3rc	<u>oker</u>			Υe
D	Does the <i>private fund</i> use one or more prir	ne brokers?		•
			(e) below for each prime broker the <i>private fund</i> uses. rough (e) separately for each prime broker.	If the pri
,	Additional Prime Broker Information : 1	Record(s) Filed.		
	•		h (e) below for each prime broker the <i>private fund</i> usens (b) through (e) separately for each prime broker.	s. If the
	(b) Name of the prime broker: UBS SECURITIES LLC			
	(c) If the prime broker is registered with 8 - 22651	າ the SEC, its registration number	:	
	CRD Number (if any): 7654			
	(d) Location of prime broker's office use	d principally by the <i>private fund</i> (c	ity, state and country):	
	City:	State:	Country:	
	NEW YORK	New York	United States	Yes
			fund's assets?	. 00
	(e) Does this prime broker act as custoo	dian for some or all of the <i>private</i> in	unu s assets:	⊙
	(e) Does this prime broker act as custoo	dian for some or all of the <i>private</i>	unu 3 u33et3:	<u> </u>
ian		dian for some or all of the <i>private</i>	unu s ussets:	
	1	·	above) to hold some or all of its assets?	Ye
D	Does the <i>private fund</i> use any custodians (f the answer to question 25.(a) is "yes,"	including the prime brokers listed	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If	Ye G
D If	ooes the <i>private fund</i> use any custodians (including the prime brokers listed respond to questions (b) through nust complete questions (b) throu	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If	Ye G
D If	Does the <i>private fund</i> use any custodians (If the answer to question 25.(a) is "yes," and uses more than one custodian, you make the custodian of the custodi	(including the prime brokers listed respond to questions (b) through nust complete questions (b) through cord(s) Filed. " respond to questions (b) through	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If gh (g) separately for each custodian. h g) below for each custodian the <i>private fund</i> uses. If	Ye G he <i>privat</i>
D If	Does the <i>private fund</i> use any custodians (If the answer to question 25.(a) is "yes," and uses more than one custodian, you made the control of the custodian of the custodia	(including the prime brokers listed respond to questions (b) through nust complete questions (b) through cord(s) Filed. " respond to questions (b) through	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If gh (g) separately for each custodian. h g) below for each custodian the <i>private fund</i> uses. If	Ye G he <i>privat</i>
D If	Does the <i>private fund</i> use any custodians (If the answer to question 25.(a) is "yes," and uses more than one custodian, you make the custodian of the custodi	(including the prime brokers listed respond to questions (b) through nust complete questions (b) through cord(s) Filed. " respond to questions (b) through	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If gh (g) separately for each custodian. h g) below for each custodian the <i>private fund</i> uses. If	Ye G he <i>privat</i>
D If	Does the <i>private fund</i> use any custodians (of the answer to question 25.(a) is "yes," and uses more than one custodian, you mean that the answer to question 25.(a) is "yes, fund uses more than one custodian, you (b) Legal name of custodian:	including the prime brokers listed respond to questions (b) through nust complete questions (b) through cord(s) Filed. " respond to questions (b) through must complete questions (b) through the complete questions (c) through the complete questions (b) through the complete questions (b) through the complete questions (c) through	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If gh (g) separately for each custodian. h g) below for each custodian the <i>private fund</i> uses. If	Ye G he <i>privat</i>
D If	Does the <i>private fund</i> use any custodians (of the answer to question 25.(a) is "yes," is und uses more than one custodian, you make the answer to question 1 formation: 1 Results of the answer to question 25.(a) is "yes, fund uses more than one custodian, you (b) Legal name of custodian: UBS SECURITIES LLC (c) Primary business name of custodian UBS SECURITIES LLC	(including the prime brokers listed respond to questions (b) through nust complete questions (b) through cord(s) Filed. " respond to questions (b) through must complete questions (b) through the complete questions (c) through the complete questions (b) through the complete questions (c) through	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If gh (g) separately for each custodian. h g) below for each custodian the <i>private fund</i> uses. If	Ye G he <i>privat</i>
D If	Does the <i>private fund</i> use any custodians (If the answer to question 25.(a) is "yes," and uses more than one custodian, you maked the answer to question 1 Reference of the answer to question 25.(a) is "yes, fund uses more than one custodian, you (b) Legal name of custodian: UBS SECURITIES LLC (c) Primary business name of custodian UBS SECURITIES LLC	(including the prime brokers listed respond to questions (b) through nust complete questions (b) through cord(s) Filed. " respond to questions (b) through must complete questions (b) through must complete questions (b) through the questions (c) through the questions (d) throug	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If gh (g) separately for each custodian. In the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses. It should be used to the private fund uses. If the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to the private fund uses are supplied to the private fund uses. If the private fund uses are supplied to th	Ye contact the private the pri
D If	Does the <i>private fund</i> use any custodians (of the answer to question 25.(a) is "yes," is and uses more than one custodian, you much additional Custodian Information: 1 Results of the answer to question 25.(a) is "yes, fund uses more than one custodian, you (b) Legal name of custodian: UBS SECURITIES LLC (c) Primary business name of custodian UBS SECURITIES LLC (d) The location of the custodian's office City:	including the prime brokers listed respond to questions (b) through nust complete questions (b) through cord(s) Filed. "respond to questions (b) through must complete questions (b) through must complete questions (b) through the properties of th	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If gh (g) separately for each custodian. The private fund uses are supplied to the private fund uses. If sough (g) separately for each custodian. If you was a separately for each custodian.	Ye G he <i>privat</i>
D If	Does the private fund use any custodians (If the answer to question 25.(a) is "yes," and uses more than one custodian, you maked the answer to question 25.(a) is "yes, fund uses more than one custodian, you will be answer to question 25.(a) is "yes, fund uses more than one custodian, you (b) Legal name of custodian: UBS SECURITIES LLC (c) Primary business name of custodian UBS SECURITIES LLC (d) The location of the custodian's office City: NEW YORK (e) Is the custodian a related person of your content of the custodian and the custodian and the custodian are lated person of your custodian are lated	(including the prime brokers listed respond to questions (b) through nust complete questions (b) through cord(s) Filed. " respond to questions (b) through must complete questions (b) through must complete questions (b) through must complete questions (b) through the properties of	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If the ghold of the general section of t	Yes
D If	Does the <i>private fund</i> use any custodians (of the answer to question 25.(a) is "yes," is and uses more than one custodian, you much additional Custodian Information: 1 Results of the answer to question 25.(a) is "yes, fund uses more than one custodian, you (b) Legal name of custodian: UBS SECURITIES LLC (c) Primary business name of custodian UBS SECURITIES LLC (d) The location of the custodian's office City: NEW YORK	(including the prime brokers listed respond to questions (b) through nust complete questions (b) through cord(s) Filed. " respond to questions (b) through must complete questions (b) through must complete questions (b) through must complete questions (b) through the properties of	above) to hold some or all of its assets? (g) below for each custodian the <i>private fund</i> uses. If the ghold of the general section of t	Yes

	CRD Number (if any): 7654		
	(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)	,	
Adminis		Yes	No
26. (a)	Does the <i>private fund</i> use an administrator other than your firm?	\odot	С
	If the answer to question 26.(a) is "yes," respond to questions (b) through (f) below. If the <i>private fund</i> uses more than one administrator must complete questions (b) through (f) separately for each administrator.	or, y	ou
	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:		
	NORTHERN TRUST HEDGE FUND SERVICES LLC		
	(c) Location of administrator (city, state and country):		
	City: State: Country:		
	CHICAGO IIIinois 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) <i>private fund's</i> investors? If investor account statements are not sent to the (rest of the) <i>private fund's</i> investors, respond "not applicable."		
you 100			
rele	lude only those assets where (i) such <i>person</i> carried out the valuation procedure established for that asset, if any, including obtaining angevant quotes, and (ii) the valuation used for purposes of investor subscriptions, redemptions or distributions, and fee calculations (includi exations) was the valuation determined by such <i>person</i> .	-	
larket			
3. (a)	Does the <i>private fund</i> use the services of someone other than you or your <i>employees</i> for marketing purposes?	Yes	No
	You must answer "yes" whether the <i>person</i> acts as a placement agent, consultant, finder, introducer, municipal advisor or other solicitor 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 f</i> uses. If the <i>private fund</i> uses more than one marketer you must complete questions (b) through (g) separately for each marketer.	, or	
	No Information Filed		
	Funds per Page: 15 Total Funds: 10		
ΓΙΟΝ	7.B.(2) Private Fund Reporting		

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 Client Transactions		
A.	Do y	you or any <i>related person</i> :	Yes	No
	(1)	buy securities for yourself from advisory clients, or sell securities you own to advisory clients (principal transactions)?	\circ	\odot
	(2)	buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	•	0
	(3)	recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	•	0
Sal	es In	terest in Client Transactions		
B.	Do y	you or any <i>related person</i> :	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory client securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	•
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	•	0
	(3)	recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	0	•
Inv	estm	nent or Brokerage Discretion		
C.		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?	•	0
	(2)	amount of securities to be bought or sold for a <i>client's</i> account?	•	0
	(3)	broker or dealer to be used for a purchase or sale of securities for a client's account?	•	0
	(4)	commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	•	o
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 related persons?	0	0
G.	(1)	Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?	•	0
	(2)	If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?	•	0
Н.	(1)	Do you or any related person, directly or indirectly, compensate any person that is not an employee for client referrals?	0	•
	(2)	Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)?	0	•
I.	-	you or any related person, including any employee, directly or indirectly, receive compensation from any person (other than you or any related son) for client referrals?	0	0
	In y	our response to Item 8.1., do not include the regular salary you pay to an employee.		
	fron	esponding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or re n (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount rrals.		

Item 9 Custody

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

A. ((1) Do you have <i>custody</i> of any advisory <i>clients</i> :	yes	IVO
	(a) cash or bank accounts?	•	0
	(h) securities?	~	_

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

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

you have custody: Total Number of Clients U.S. Dollar Amount (a) \$ 2,834,600,114 (b) 13 If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2). (1) In connection with advisory services you provide to clients, do any of your related persons have custody of any of your advisory clients': Yes No (a) cash or bank accounts? **(** \circ (b) securities? \odot You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b). (2) If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of client funds and securities and total number of clients for which your related persons have custody: U.S. Dollar Amount Total Number of Clients (a) \$ (b) C. If you or your related persons have custody of client funds or securities in connection with advisory services you provide to clients, check all the following that apply: (1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage. V (2) An independent public accountant audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools. (3) An independent public accountant conducts an annual surprise examination of client funds and securities. (4) An independent public accountant prepares an internal control report with respect to custodial services when you or your related persons are qualified custodians for *client* funds and securities. If you checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B.(1) of Schedule D). D. Do you or your related person(s) act as qualified custodians for your clients in connection with advisory services you provide to clients? Yes No (1) you act as a qualified custodian \circ \odot (2) your related person(s) act as qualified custodian(s) 0 \odot If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act. E. If you are filing your annual updating amendment and you were subject to a surprise examination by an independent public accountant during your last fiscal year, provide the date (MM/YYYY) the examination commenced: 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 You must complete the following information for each independent public accountant engaged to perform a surprise examination, perform an audit of a pooled investment vehicle that you manage, or prepare an internal control report. You must complete a separate Schedule D Section 9.C. for each independent public accountant. (1) Name of the independent public accountant: **DELOITTE & TOUCHE LLP** (2) The location of the *independent public accountant's* office responsible for the services provided: Number and Street 2: Number and Street 1: 111 SOUTH WACKER DRIVE Country: ZIP+4/Postal Code: City: State: CHICAGO Illinois **United States** 60606-4301

(3) Is the independent public accountant registered with the Public Company Accounting Oversight Board?						
	If "yes," Public Company Accounting Oversight Board-Assigned Number: 34					
(4)	If "yes" to (3) above, is the <i>independent public accountant</i> subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?	•	0			
(5)	The <i>independent public accountant</i> is engaged to: A. ✓ audit a pooled investment vehicle B. ☐ perform a surprise examination of <i>clients'</i> assets C. ☐ prepare an internal control report					
(6)	Since your last annual updating amendment, did all of the reports prepared by the independent public accountant that audited the pooled invest vehicle or that examined internal controls contain unqualified opinions?	tmen	nt			
	O YesO 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 when the accountant's reparallable.	ort is				
In th	n 10 Control Persons 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 I ald be provided for the filing adviser only.	tem '	10			
and	ou are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners. If this is an amendment and you are updating information you either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.	repor	ted			
Α.	Does any <i>person</i> not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, <i>control</i> your management or policies?	C	s No			
	If yes, complete Section 10.A. of Schedule D.					
	If any <i>person</i> 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 S Exchange Act of 1934, please complete Section 10.B. of Schedule D.	ecuri	ties			
SECT	TION 10.A. Control Persons					
	No Information Filed					
SECT	TION 10.B. <i>Control Person</i> Public Reporting Companies					
	No Information Filed					
In th dete inves	nis Item, we ask for information about your disciplinary history and the disciplinary history of all your advisory affiliates. We use this information termine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities estment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the filing adviser and all relying advisers are largest registration.	as ai	e than			
of yo	advisory affiliates are: (1) all of your current employees (other than employees performing only clerical, administrative, support or similar function our officers, partners, or directors (or any person performing similar functions); and (3) all persons directly or indirectly controlling you or controlled are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your advisory affiliates are	ed by				

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

disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary

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

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

orders, judgments, or decrees lapsed.

Yes No

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

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

- 0

Α.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	0	\circ
If "	yes," you do not need to answer Items 12.B. and 12.C.		
В.	Do you:		
	(1) control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0
C.	Are you:		
	(1) controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?	0	0
	(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the	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:

last day of its most recent fiscal year?

- (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions:
- (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act); Direct owners include any person that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a person beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-inlaw, 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, all 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.
- 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	DE/FE/I	Title or Status	Date Title or Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date
Name, First Name, Middle Name)			Acquired MM/YYYY	Code	Person		of Birth, IRS Tax No. or Employer
							ID No.
JACOBSON, ANDREW, HARRIS	I	CEO / CIO	08/1998	NA	Υ	N	2248080
AMOILS, BRADLEY	I	MANAGING	01/2006	NA	N	N	2729692

		DIRECTOR/PORTFOLIO					
		MANAGER					
ZAMBARDI, DENISE, MARIE	I	CHIEF COMPLIANCE OFFICER/CONTROLLER	09/2004	NA	N	N	2432711
FRANCO, MATTHEW, ALEXANDER	I	MANAGING DIRECTOR/PORTFOLIO MANAGER	01/2006	NA	N	N	2795674
AXIOM INVESTORS LP	DE	MEMBER	12/2013	E	Υ	N	
AXIOM HOLDINGS GP CORP	DE	MANAGING MEMBER	07/2021	NA	Υ	N	
AZIMI, EDWARD, ANTHONY	I	CHIEF OPERATING OFFICER	06/2015	NA	N	N	4281306
CHAMBERLAIN, LINDSAY, RAE	I	MANAGING DIRECTOR OF CLIENT PARTNERSHIPS	03/2021	NA	N	N	5147397

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 (Individuals: Last Name, First Name, Middle	DE/FE/I	Entity in Which Interest is	Status	Date Status Acquired		Control Person		CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or
Name)		Owned		MM/YYYY				Employer I D No.
AXIOM HOLDINGS GP CORP	DE	AXIOM INVESTORS LP	GENERAL PARTNER	12/2013	F	Υ	N	
JACOBSON, ANDREW, HARRIS	I	AXIOM INVESTORS LP	LIMITED PARTNER, TRUSTEE, PRESIDENT, CEO	12/2013	D	Υ	N	2248080
JACOBSON, ANDREW, HARRIS	1	AXIOM HOLDINGS GP CORP	SHAREHOLDER, PRESIDENT, DIRECTOR, TRUSTEE	12/2013	Е	Υ	N	2248080

Schedule D - Miscellaneous

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

Schedule R

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

Part 2

No Information Filed

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?

0 0

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
46909	ADV PART II	Pension plans/profit sharing plans,
		Foundations/charities, Government/municipal, Other
		institutional, Private funds or pools
	<u> </u>	·

Part 3

CRS Type(s) Affiliate Info Retire

There are no CRS filings to display.

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

DENISE ZAMBARDI 03/27/2024

Printed Name: Title:

DENISE ZAMBARDI CHIEF COMPLIANCE OFFICER

Adviser *CRD* Number: 109605

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:

109605



Firm Brochure

(Part 2A of Form ADV)

Axiom Investors LLC 33 Benedict Place Greenwich, CT 06830 203-422-8000 axiom-investors.com

This brochure (the "Brochure") provides information about the qualifications and business practices of Axiom Investors LLC ("Axiom"). If you have any questions about the contents of this Brochure, please contact us at: 203-422-8000, or by email at:

compliancegroup@axiom-investors.com

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC"), or by any state securities authority.

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

March 27, 2024

Item 2: Material Changes

Annual Update

Pursuant to SEC requirements and rules, Axiom will make available a summary of any material changes to this Brochure and any subsequent brochure within 120 days of its fiscal year end. Additionally, Axiom may further provide other ongoing disclosure information about material changes as necessary.

Material Changes since the Last Update

There have been no material changes since the last update.

Full Brochure Available

Whenever you would like to receive a complete copy of the Brochure, please contact us by telephone at: 203-422-8000 or by email at: InvestorServices@axiom-investors.com.

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Item 4: Advisory Business

Firm Description

Axiom Investors LLC ("Axiom") was formed on September 1, 1998, as an independent investment advisor by Andrew Jacobson. From its origins in 1998 as an investment advisor specializing in managing international equity portfolios, Axiom Investors has evolved into the global investment management firm it is today. Axiom manages international, global, small cap, and emerging market equities on behalf of our global institutional clients. Axiom has been 100% employee-owned and has been registered as an investment advisor with United States Securities and Exchange Commission (the "SEC") since inception. Axiom is the operating subsidiary of Axiom Investors, L.P., the principal owner of which is Andrew Jacobson. Axiom conducts its business as "Axiom Investors".

Axiom seeks to consistently provide top-tier investment performance by implementing a common investment philosophy and process consistently across all strategies while monitoring its growth levels to ensure that Axiom meets its objectives. Axiom seeks to build long-term client partnerships with sophisticated investors around the world. Our client base is primarily institutional and includes pension plans, government entities, financial institutions, endowments and foundations.

Axiom provides discretionary investment advice to clients and investors through (i) institutional separate accounts, (ii) collective investment vehicles sponsored by Axiom (the "Funds"), (iii) model/unified managed accounts (UMAs), (iv) sub-advised registered mutual funds and (v) one or more UCITS funds for Non-U.S. investors (collectively "Clients"). As of February 29, 2024, net assets under management approximated \$21.4 billion United States dollars. All assets are managed on a discretionary basis.

Axiom specializes in equity related strategies. These equity related strategies include international equity, global equity, emerging markets equity, international small/micro-cap equity, international small cap equity, global small cap equity, global small/micro-cap equity, U.S. small cap equity, emerging markets world equity, and concentrated global growth equity.

The investments of each Fund are managed in accordance with their stated investment objectives and strategies and are not tailored to any particular investor in the Funds. The investments for each separate account are managed in accordance with a Client's investment objectives and various restrictions and limitations, including restrictions on investing in certain securities or types of securities, as negotiated with or provided by such Client or its representatives.

Item 5: Fees and Compensation

Description

The advisory fees paid to Axiom by Clients for advisory services vary depending on the investment strategy utilized and the type of Client. The current standard fee schedule with respect to the new investments is set forth below.

International Equity Long Only Portfolios and Axiom International Equity Fund II:

0.85% per annum of assets on the first \$25 million 0.75% of assets over \$25 million

Global Equity Long Only Portfolios:

0.80% on the first \$25 Million 0.70% on the next \$50 Million 0.60% on the next \$150 Million 0.50% on the next \$250 Million

0.30% on the balance

Emerging Markets Long Only Portfolios:

1.00% per annum of assets on the first \$25 million

0.90% of assets on the next \$75 million

0.80% of assets on the next \$25 million

0.70% of assets on the next \$50 million

0.60% of assets on the balance

U.S. Small Cap Portfolios:

0.80% per annum of assets on the first \$10 million

0.75% of assets on the next \$15 million

0.70% of assets on the balance

International Small Cap Equity Long Only Portfolios:

0.95% per annum of assets on the first \$25 million

0.85% of assets on the next \$75 million

0.75% of assets on the balance

Global Small Cap Equity Long Only Portfolios:

0.95% per annum of assets on the first \$25 million

0.85% of assets on the next \$75 million

0.75% of assets on the balance

Emerging Markets World Portfolios:

1.00% per annum of assets on the first \$25 million

0.90% of assets on the next \$75 million

0.80% of assets on the next \$25 million

0.70% of assets on the next \$50 million

0.60% of assets on the balance

Concentrated Global Growth Portfolios:

0.80% per annum of assets on the first \$25 million

0.70% of assets on the next \$50 million

0.60% of assets on the next \$150 million

0.50% of assets on the next \$250 million

0.30% of assets on the balance

Axiom International Opportunity Fund, L.P., Axiom Offshore Opportunity Fund, Ltd. current schedule:

1.00% per annum

Up to a 10% performance fee or allocation, subject to a high-water mark, all payable quarterly in arrears.

Axiom International Small/Micro Cap Opportunity Fund, L.P., Axiom Global Small/Micro Cap Opportunity Fund, L.P. current schedule:

1.75% per annum

Up to a 20% performance fee or allocation, subject to a high-water mark, all payable quarterly in arrears.

All management and performance fees/allocations paid by Clients are accrued on a monthly basis and paid quarterly. Some separate account Clients may pay management fees on a monthly basis. Some separate account Clients may pay performance fees on an annual basis.

While management and performance fees/allocations paid with respect to investments in the Funds are generally non-negotiable, Axiom may agree to execute "side letters" with certain investors in each Fund. The management fees paid to Axiom by separate account Clients and sub-advised Clients are separately negotiated and detailed in each Client's investment management or advisory agreement. Axiom will consider performance-based fees and may negotiate different fee arrangements for certain clients including, without limitation, sub-advisory relationships and charitable institutions.

In addition to management and performance fees/allocations paid to Axiom by Clients, Clients may incur brokerage, custody, borrowing costs ("hedge fund" Clients only), administration, professional (audit and legal) and other miscellaneous expenses.

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

Performance-Based Fees

Axiom may enter into performance fee arrangements with Fund Clients. Such fees generally entitle Axiom or an affiliate to a percentage of the profits of the applicable Fund, subject to any high-water mark treatment or benchmark outperformance. Axiom will consider performance-based fees for certain "long only" separate accounts. Axiom has existing performance fee arrangements with some institutional and fund type clients. Performance based fee arrangements may create an incentive for Axiom to recommend investments that could be riskier or more speculative than those that would be recommended under different fee arrangements. Please see the responses to Item 5 above.

Side-By-Side Management

Axiom provides advisory services to Clients that are charged a performance-based fee and others that are only charged management fees as described in Item 5 above. Performance-based fee arrangements with certain Clients may create an incentive for Axiom to favor those Clients over other Clients in the allocation of investment opportunities. Axiom has implemented policies and procedures designed to address a variety of conflicts that may arise from managing multiple accounts on a side-by-side basis, including, without limitation, conflicts that may arise from the purchase or sale of the same securities for more than one Client and transactions between Clients. Please see the responses to Item 12 regarding trade aggregation and allocation of investment opportunities and Item 11 regarding cross trading transactions.

Item7: Types of Clients

Description

Axiom's services are provided primarily to institutional investors. Investors in the Funds and Clients typically include corporations, foundations, endowments, pension plans, investment companies, government entities, charitable organizations, insurance companies, sovereign wealth funds and banking institutions. Axiom's services are offered through separately managed accounts, UMAs, and a variety of collective investment vehicles including but not limited to private funds, collective investment trusts and UCITS.

For each UMA, the applicable Client pays Axiom a fee for providing recommendations regarding the purchase or sale of specific securities. Axiom's recommendations are used by the Client to manage the UMA, however, decisions regarding the timing and scale of purchases/sales are those of the Client, not Axiom. Accordingly, Axiom does not implement the investment decisions for, or have trading authority over the UMA accounts.

Minimum account sizes vary by Fund or strategy.

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

Methods of Analysis

Axiom utilizes a consistent, firm-wide, dynamic growth philosophy and process that is fundamental and based on bottom-up stock selection. Our dynamic growth philosophy can be characterized as the intersection of three key elements, with the most important being positive change. Rather than focusing on backward looking financial metrics, we take a forward-looking approach to identifying potential inflections in an enterprise's key operational catalysts that could ultimately impact medium-term earnings projections. Key drivers are defined broadly to include a wide variety of factors that could have a significant impact on the short-term and long-term financial performance of the enterprise. Fundamental factors considered by Axiom include company specific factors, industry factors, secular trends, macroeconomic factors and country factors.

The most attractive companies within our framework will have (1) positive fundamental changes occurring in the context of (2) sustainable earnings growth creating natural compounding performance tailwinds, and (3) an attractive valuation providing both upside potential and risk control benefits. Valuation is an integral consideration in the investment process. Axiom considers a company's valuation to help assess the level of expectations for that company's fundamental progress and ensure that Axiom is not overpaying for the growth. Our highest conviction holdings will be viewed as having forward looking key business drivers that are growing and changing for the better, more rapidly than generally expected, and where those positive changes are not yet reflected in expectations or valuations.

Two key components of both the investment recommendation as well as the ongoing monitoring of portfolio holdings are: (i) a summary model that captures both the consensus expectations as well as the most recent actual data for the key business drivers of the enterprise; and (ii) a ranking worksheet that summarizes a variety of fundamental and statistical data in order to help calibrate the attractiveness of a particular company relative to alternative portfolio holdings. The sources of research are publicly available, such as news items, company meetings, sell-side analyst data, etc.

Environmental, Social and Governance (ESG) Considerations

Axiom holistically integrates environmental, social, and governance (ESG) considerations into our investment process, organizational structure, and firm culture. Axiom is an investor-led, performance-driven partnership implementing a differentiated fundamental, bottom-up, dynamic growth investment philosophy across the entire organization. As fiduciaries, investors, and responsible stewards of our clients' capital, we construct portfolios of dynamic growth companies designed to meet our clients' needs and deliver sustained, risk-adjusted performance over the medium-to longer term.

Axiom recognizes that the term "ESG" is not uniformly defined across the investment industry. Investment managers may apply ESG factors in different ways, and the role those factors play in investment decisions also varies. In some instances, Axiom has agreed to apply client directed ESG screens and/or ESG focused restricted lists to client accounts. This may result in different holdings for those clients, even within the same investment strategy.

Making investing decisions that emphasize ESG factors carries the risk that, under certain market conditions, the strategy may underperform those that do not integrate such factors explicitly into the decision-making process. Like any aspect of investment analysis, there is no guarantee that an investment strategy that considers ESG factors will result in performance better than or equal to strategies that do not consider such factors.

Investment Strategies

The following sets forth the general investment strategies offered by Axiom Investors LLC. Similar investment strategies are available to separate account Clients, subject to any particular investment guidelines agreed upon with a Client.

International Equity

The International Equity Strategy seeks long term compounding by focusing its investments in non-US developed markets as well as investments deriving significant revenues or growth from non-US markets, and may also invest in companies located in the emerging markets.

Global Equity

The Global Equity Strategy seeks long term compounding by focusing its investments in global developed markets and may also invest in companies located in emerging markets.

Emerging Markets Equity

The Emerging Markets Equity Strategy seeks long term compounding by focusing its investments in emerging markets.

U.S. Small Cap Equity

The US Small Cap Equity Strategy seeks to compound long term returns by focusing its investments in US small capitalization companies.

International Small Cap Equity

The International Small Cap Equity Strategy seeks long term compounding by focusing its investments in smaller capitalization companies in non-US developed markets and may also invest in companies located in emerging markets.

Global Small Cap Equity

The Global Small Cap Equity Strategy seeks long term compounding by focusing its investments in smaller capitalization companies in global developed markets and may also invest in companies located in emerging markets.

Emerging Markets World Equity

The Emerging Markets World Equity Strategy seeks long term compounding by focusing its investments in emerging market countries or companies that derive a majority of their revenues or assets from emerging market countries.

Concentrated Global Growth Equity

The Concentrated Global Growth Equity Strategy seeks long term compounding by focusing its investments into a concentrated portfolio of the most dynamic global growth opportunities.

International Opportunity Strategy The International Opportunity Strategy seeks long term compounding by focusing its investments in non-US developed markets as well as investments deriving significant revenues or growth from non-US markets and may also invest in companies located in the emerging markets. The strategy may hedge currencies, utilize leverage, and utilize short-sales of equity securities of primarily non-US companies and indices.

International Small/Micro Cap Opportunity Strategy

The International Small/Micro Cap Opportunity Strategy seeks long term compounding by focusing its investments on smaller capitalization companies in non-US developed markets as well as investments deriving significant revenues or growth from non-US markets and may also invest in companies located in the emerging markets. The strategy may hedge currencies, utilize leverage, and utilize short-sales of equity securities of primarily non-US companies and indices.

Global Small/Micro Cap Opportunity Strategy

The Global Small/Micro Cap Opportunity Strategy seeks long term compounding by focusing its investments on smaller capitalization companies in global developed markets and may also invest in companies located in the emerging markets. The strategy may hedge currencies, utilize leverage, and utilize short-sales of equity securities of primarily non-US companies and indices.

Risk of Loss

Investments in securities involve a risk of loss that Clients and Fund investors should be prepared to bear. There can be no assurance that a Client's investment objective can be achieved. The primary risks inherit in the equity strategies for Funds and other Clients are as follows:

- Market Risk –the risk that the value of an investment will fluctuate as a result of changes in market price. This may be systematic market risk or specific individual investment market risk.
- Currency Risk Clients may hold assets denominated in currencies other than United States dollars. These investments are exposed to currency risk, as the value of the securities denominated in other currencies may fluctuate due to changes in exchange rates.
- 3. Liquidity Risk at times equity markets may be subject to liquidity events that would preclude the timely liquidation of securities to meet cash needs.
- 4. Credit Risk the risk that a counterparty will be unable to pay amounts in full when due.
- 5. Frequent Trading frequent trading of securities can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.
- International/Emerging Market Securities investments in securities of foreign issuers
 and securities traded principally in markets outside the United States involve special risks
 due to foreign economic, political and legal developments.
- 7. Small and Micro-Capitalization Securities small and micro-capitalization companies often experience greater price volatility, lower trading volume and less liquidity than larger, more established companies.
- 8. Derivatives/Hedging derivatives used to hedge various market risks, to manage the effective maturity or duration of fixed income securities or exposure to various equity and

- other markets impose costs and involve risks, such as heightened counterparty risks, lack of liquidity, ineffectiveness of hedging in a particular situation, and the possible accentuation of losses or reductions in gains of the underlying securities.
- 9. General Economic and Market Conditions General economic, market conditions or events throughout the world that are outside of the control of Axiom, including but not limited to changes in interest rates, availability of credit for public and private borrowing, public market volatility, inflation rates, economic uncertainty, industry conditions, competition, technological developments, changes in laws (including laws relating to taxation), trade barriers, commodity prices, currency exchange rates and controls and national and international political circumstances (including wars, terrorist acts or security operations) may adversely affect the client's investment.
- 10. Systemic Risk Credit risk may arise through a default by one of several large institutions that are dependent on one another to meet their liquidity or operational needs, so that a default by one institution causes a series of defaults by the other institutions.
- 11. Risk of Investing in Equity Securities Generally The client's investment portfolio includes equity and equity-related securities. Equity securities fluctuate in value in response to many factors, including the activities and financial condition of individual companies.

For a description of the risks relating to any Fund please refer to the private placement memorandum or offering memorandum for that Fund.

Axiom has implemented various diversification, liquidity and credit monitoring policies and procedures to attempt to mitigate some of the above risks.

Item 9: Disciplinary Information

Legal and Disciplinary

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to a client's evaluation of the investment adviser or the integrity of its management. Axiom has no disciplinary matters required to be disclosed under this Item.

Item 10: Other Financial Industry Activities and Affiliations

Other Financial Industry Activities

A registered investment adviser is required to disclose whether it or any of its management persons are registered, or have an application pending to register, as a (A) broker-dealer or a registered representative of a broker-dealer, or (B) futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities. Neither Axiom nor any of its management persons are registered as such or have any application for such registration pending.

Material Relationships and Arrangements

Axiom serves in a general partner or equivalent role for each of the entities listed below.

- 1. Axiom International Equity Fund II
- 2. Axiom Emerging Markets Equity Fund

- 3. Axiom Emerging Markets World Equity Fund
- 4. Axiom US Small Cap Equity Portfolio
- 5. Axiom International Small-Cap Equity Fund
- 6. Axiom Concentrated Global Growth Equity Fund
- 7. Axiom International Opportunity Fund, L.P.
- 8. Axiom Offshore Opportunity Fund, Ltd.
- 9. Axiom International Small/Micro-Cap Opportunity Fund, L.P.
- 10. Axiom Global Small/Micro-Cap Equity Opportunity Fund, L.P.
- 11. Axiom Advisors LLC
- 12. Axiom Offshore GP Ltd.
- 13. Axiom Investors LP

Axiom Advisors LLC, a Delaware limited liability company, serves as the administrative general partner for Axiom International Opportunity Fund, L.P.

Axiom Offshore GP Ltd, a Cayman Islands corporation, serves as general partner of Axiom Offshore Opportunity Fund, Ltd.

Axiom serves as the Investment Manager of Axiom Investors ICAV (an Irish collective asset management vehicle), and certain individuals affiliated with Axiom serve on its Board of Directors.

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

Code of Ethics

Axiom maintains a Code of Ethics that provides all employees, members, managers and officers ("Access Persons") with guidance on proper conduct in fulfilling their obligations as fiduciaries to clients of Axiom, and in complying with SEC rules. The Code of Ethics stresses the importance of avoiding activities, interests and relationships that might interfere with making decisions in the best interests of the clients of Axiom. Access Persons are reminded that they must at all times (1) place the interests of advisory clients first, (2) conduct all personal securities transactions in full compliance with the Code of Ethics, including all pre-trade clearance and reporting requirements, and holding period requirements, and (3) avoid taking inappropriate advantage of their position.

The Code of Ethics also requires Access Persons to make certain disclosures regarding their trading and personal portfolios and requires employees obtain pre clearance to participate in private placements and new issues. A primary purpose of requiring preclearance of IPO investments and private placements is to prevent an Axiom employee from investing in IPO Securities or private placements in circumstances that could disadvantage Axiom or its Clients (for example, if the investment opportunity should be reserved for Axiom Clients).

Axiom's Code of Ethics is administered and enforced by its Chief Compliance Officer (the "CCO").

Axiom will provide a copy of its Code of Ethics to any Client or prospective client upon request.

Participation or Interest in Client Transactions and Personal Trading

Axiom, as the direct or indirect general partner of certain Funds, and its employees may participate or invest in the Funds and receive a portion of the performance fees/allocations paid to Axiom by the Funds. On occasion, Axiom's personnel may also buy or sell securities for their personal accounts that have been or will be recommended to Axiom's Funds or Clients. All personal trades

must be in compliance with Axiom's Code of Ethics, including all pre-trade clearance and reporting requirements.

Axiom may from time to time solicit clients to invest in Funds.

Conflicts of Interest

Axiom has implemented policies and procedures relating to, among other things personal trading and insider trading, that are designed to prevent the "front-running" of Client trades, the favoring of employees and other actual conflicts of interest that may arise from Axiom recommending to Clients, or buying or selling for Clients, securities in which Axiom or an employee has an interest.

It is Axiom's policy to not engage in transactions with its Clients as a principal. Axiom may arrange for the sale or purchase of a security at the then applicable market price between two Clients through the use of an independent broker dealer subject to applicable laws or contracts.

Item 12: Brokerage Practices

Selecting Brokerage Firms

Axiom selects brokers based on a variety of factors, including price, expertise, and willingness to handle large block transactions, the ability to accumulate positions in traded, smaller capitalization securities, execution ability, confidentiality, clearing capabilities, reliability and financial responsibility. Axiom's primary objective in the selection of executing brokers is to obtain the best combination of price and execution in the market or markets involved. Transaction charges, including principal mark ups and mark downs, being a component of price, are also considered as a factor. Commission rates vary by country. Axiom seeks to negotiate favorable commission rates on an ongoing basis with brokers in a particular country or geographic region. In selecting brokers, Axiom also considers whether the broker provides support to the investment decision making process by making available products and services that directly assist Axiom's investment decision-making process.

Best Execution

As an investment adviser with the authority to place client trades, Axiom has a general fiduciary obligation to seek best execution for its Funds and Clients. The SEC generally describes best execution as a duty to execute securities transactions so that a client's total cost or proceeds in each transaction are the most favorable under the circumstances. The duty begins with a requirement that an adviser should obtain the best price available for the securities in each transaction. After determining best price, an adviser is not necessarily required to obtain the lowest possible commissions but may instead consider qualitative factors such as the broker's order expertise, reputation, facilities and access to a particular trading market.

Axiom monitors the quality of trade execution on an ongoing basis through communications by and among Portfolio Managers and Trading Department.

Axiom's Trading Department, Portfolio Managers and research analysts conduct reviews of brokerage trade execution at least semi-annually. In conducting these reviews, Axiom considers information regarding the quality of trade execution, service, corporate access, and research quality on the spreadsheet prepared from the daily trade blotter and any other information. Based on these reviews and also the results of the semi-annual broker vote, each of the brokers is ranked based on the quality of execution. The reviews are documented and copies are provided to the CCO and CEO. Axiom uses trade cost analysis software to review post trade execution statistics.

Axiom executes foreign exchange ("FX") transactions in developed markets and/or in all unrestricted currency markets on behalf of all its commingled funds and the majority of its separately managed accounts. Axiom conducts these FX transactions because it believes it is able to achieve, more timely, responsive, and cost effective execution than other counterparties. In

some instances for separately managed accounts, the client chooses or is required by foreign laws and regulations to have the custodian execute all FX transactions for the account. In restricted currency markets for all accounts (e.g., Indonesia, South Korea, and Taiwan) where Axiom is prohibited by local law from executing FX trades on behalf of its clients, entities other than Axiom, typically the custodian, execute FX trades for Axiom's clients.

Axiom periodically reviews the FX execution quality for both the unrestricted market FX transactions executed by Axiom and the restricted market FX transactions executed by the custodian banks.

Directed Brokerage

Unless Clients give Axiom specific directions to the contrary, Axiom will select brokers through whom trades are executed. Clients may request that Axiom direct specific amounts of brokerage to a particular broker-dealer in connection with services rendered by those broker-dealers directly to the Client. Any Client directed brokerage instructions shall be in writing. Clients that provide directed brokerage instructions to Axiom must be aware that such arrangements may cause them to give up benefits of better pricing or lower commission that might otherwise be available through participation in bunched orders, resulting in added costs for the Client.

Soft Dollars

Axiom selects brokers to execute purchase and sale transactions for its Funds and Clients based on a variety of factors, including price, the ability of the brokers to effect the transactions, the broker's facilities, reliability and financial responsibility.

Axiom has adopted policies and procedures pursuant to which it may acquire brokerage and research products and services through the use of commissions or "soft dollars," to the extent permitted within the safe harbor of Section 28(e) of the Securities Exchange Act of 1934 and related SEC guidance ("Eligible Purposes"). Section 28(e) allows an adviser to cause client accounts to pay a commission higher than the commission another broker or dealer would have charged if the adviser determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research products and services provided by such broker-dealer. Brokerage and research services obtained by Axiom with soft dollars may include, among other things, research concerning market, economic and financial data, a particular aspect of economics or on the economy in general, statistical information, data or pricing regarding securities, financial publications, electronic market quotations, performance analytics, analyses concerning specific securities, companies, industries or sectors and market, economic and financial studies and forecasts.

The receipt of research and brokerage services in exchange for soft dollars benefits Axiom as it permits Axiom to obtain research and other services at no cost to Axiom. Accordingly, Axiom may have an incentive to select or recommend a broker-dealer based on Axiom's interest in receiving research and brokerage services, rather than on its Clients' interest in receiving most favorable execution.

Axiom recognizes the conflicts of interest inherent in the receipt of soft dollars benefits. When utilizing soft dollars for any trades, Axiom continues to ensure that all trading is done consistently with its best execution policies and procedures and all soft dollars are spent on Eligible Purposes. Further, Axiom's soft dollar arrangements are reviewed on an ongoing basis by the CCO to ensure compliance with Section 28(e). On an annual basis, all services are reviewed by Axiom's CCO to determine if those services should be renewed for the next year. Any services that have the capacity to be used both for eligible purposes and other purposes are designated as mixed use products and calculations are done to ensure that only the portion of the overall expense attributable to the eligible purposes is paid through soft dollars, with Axiom paying for the non-eligible portion out of its own "hard dollar" asset.

Certain clients may be subject to non-US regulations that are inconsistent with standard trading practices in the United States. For example, recent revisions to the EU Markets in Financial Instruments Directive ("MiFID") and related regulations limit adviser's ability to receive research products and services from executing brokers. While Axiom is not directly subject to these

regulations, it may adjust its standard trading practices on a case-by-case basis to accommodate compliance with MiFID and other non-US regulations by its clients. These accommodations may include non-participation in the generation of soft-dollar credits. For clients required to adhere to MiFID and certain other separately managed account clients that have elected to opt-out of soft dollar generation, Axiom will execute trades at execution only commission rates.

Soft dollars benefits received by Axiom are used to service all of Axiom's Clients, including those Clients that do not participate in generating soft dollar credits. However, soft dollars benefits may not be used for the benefit of each and every Client, and brokerage commissions paid by one Client may be used to pay for research or other products or services that may not be used to service that Client. Axiom does not typically attempt to allocate the relative costs or benefits of soft dollars among Clients as the research and brokerage services it receives benefits all Clients and assists Axiom in its investment decision making process.

Aggregation

As an adviser to multiple Clients with similar strategies and as a result of Axiom's investment approach, Axiom typically purchases or sells the same securities for more than one Client at the same time. In determining whether or not a Client will participate in the purchase or sale of a particular security, Axiom may consider among other factors, the investment objective, guidelines and restrictions applicable to such Client and such Client's investment horizon, risk tolerance, liquidity requirements and any regulatory restrictions.

Axiom maintains an allocation policy to allocate the purchases and sales of securities suitable for two or more Clients or any order that is only partially filled on a fair and equitable basis. The policy is designed to ensure that all Clients within a particular investment strategy are treated fairly and have equal access to suitable investment opportunities. The CCO reviews allocations periodically to ensure that all Clients are treated fairly. Additionally, monthly performance reviews are performed for Clients with similar strategies to determine that similar rates of return are attained by each Client within a particular strategy. These reviews are maintained by the compliance department.

It is Axiom's policy that aggregated trades are to be allocated to eligible Clients in a fair and equitable manner. The general allocation procedures are as follows:

- Axiom's order management system, EZE, automatically performs pro-rata trade allocations
 for all accounts within the same strategy when an order is received. The trade allocation
 specifies the participating Client accounts and how the system intends to allocate the order
 among those Clients. Accounts that are blocked on a pre trade basis because of client or
 regulatory constraints (e.g., client imposed restricted list) are automatically excluded from
 the allocation.
- 2. If the aggregated order is filled in its entirety, it will be allocated among Clients in accordance with the Allocation Statement. In the case of purchases, if the order is partially filled, it will be allocated on a pro rata basis such that each Client will receive a portion of the order based on the amount specified on the Allocation Statement for such Client relative to the total order amount shown on the Allocation Statement for all Clients. In the case of sales of securities, if the sale order exceeds the amount available to be purchased, allocations will be made on a pro rata basis based on each Client's position size in the security.
- 3. Axiom may round off the number of shares received by an account to avoid odd lots that would otherwise result from a pro rata allocation.
- 4. An aggregated order may be allocated on a basis different from the manner described above in clause (2) if all Clients receive fair and equitable treatment and the reason for the different allocation is documented in writing at time of trade entry by the trading desk.

Axiom's allocation policy with respect to initial public offerings ("IPOs") is to allocate shares acquired in an IPO to IPO-eligible Clients in a fair and equitable manner. If the allocation of IPO shares equals or exceeds a prescribed threshold, the IPO shares shall be allocated in the manner described above in clause (2). If the allocation of IPO shares is less than the prescribed threshold, the IPO shares will be allocated in accordance with a rotation list.

Axiom's UMA clients receive an updated model portfolio file regularly. At the inception of the UMA relationship, the UMA client will specify which day or days of the week that the client requires delivery of the file. As a result of the nature of UMA Model client relationships, the UMA client receives trading information later than the discretionary accounts that Axiom trades directly.

Item 13: Review of Accounts

Reviews of the portfolio holdings and cash levels of Clients are generally conducted on a daily basis. In addition, a Client's portfolio is also typically reviewed weekly with specific attention paid to diversification and risk characteristics. Ad hoc reviews are also conducted when market conditions warrant. Where appropriate, particular attention is paid in the review process to specific preferences and guidelines of a Client. Although the investment process is organized as a team effort, each Client's portfolio manager generally conducts all portfolio reviews. At times, other senior investment professionals can conduct reviews as well. The team structure is intended to ensure the consistent application of the investment discipline and to facilitate Axiom's ability to identify and respond quickly to meaningful changes in the fundamentals that affect existing and potential holdings.

Axiom's compliance department conducts an independent review of Clients on a monthly basis by comparing the monthly performance results of Clients with similar strategies to determine that similar rates of return are attained by each Client within a particular strategy.

Other conditions that may trigger a review of Clients are changes in the tax laws, new investment information, and changes in a particular Client's own situation.

Reviews with Clients are done both in person and in writing. A formal written review of portfolio performance and of market performance is typically provided to Clients on a quarterly basis, and more often if requested. In person reviews are normally done semi-annually or when requested, and include a discussion of the investment process and performance as well as the current portfolio holdings and certain portfolio characteristics.

In addition, audited financial statements are provided annually to all investors in each Fund.

Item 14: Client Referrals

Incoming Referrals

Axiom has been fortunate to receive many client referrals over the years. The referrals have come from current Clients, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. Axiom does not compensate referring parties for these referrals.

Item 15: Custody

Axiom separate account clients and Funds typically maintain custody arrangements through independent qualified custodians. However, Axiom may in some circumstances be deemed to have "custody" as defined in Rule 206(4)-2 under the Investment Advisers Act of 1940, as amended (the "Advisers Act"), of Client securities and funds, even though it does not actually maintain Client assets.

All Client assets, including Fund assets, to which Axiom has been deemed to have "custody" are maintained at qualified custodians and sub-custodians selected by the Client. On an annual basis all Funds are audited by independent auditors. Audited financial statements are provided to all investors in each Fund within 120 days of such Fund's fiscal year end.

The Adviser does not provide custodial services to Clients. Each Client and Fund investor should carefully review statements provided by Axiom and/or the applicable qualified custodian to determine that they are complete and accurate for the applicable period. To the extent any Client or Fund investor receives statements from both Axiom and the applicable qualified custodian, the Client or Fund investor should compare the statements periodically.

Item 16: Investment Discretion

Discretionary Authority for Trading

Axiom has discretion with respect to the securities to be bought or sold, and the amount of the securities to be bought or sold, by the Funds and Clients, without obtaining prior consent or approval from each Fund or Client for each transaction. Purchases and sales of securities may be subject to investment guidelines and restrictions set forth in Client agreements.

Item 17: Voting Client Securities

Proxy Votes

Axiom has established Proxy Voting Policies and Guidelines (the "Policies") pursuant to Rule 206(4)-6 under the Advisers Act. Axiom's proxy voting policies reflect the long-standing fiduciary standards and responsibilities for ERISA accounts as well as the 2019 SEC guidance regarding proxy voting. For Clients that Axiom has the power to vote proxies, Axiom will vote proxies in accordance with the Policies. The Policy permits Axiom to consider, but does not require Axiom to adhere to, the proxy voting guidelines established by Institutional Shareholder Services Inc. (ISS) when casting proxy votes on behalf of Clients. ISS is a third party vendor that receives proxy ballots, works with custodian banks, executes votes, maintains vote records, and provides comprehensive reporting. Upon request, Axiom will provide a Client with a copy of Axiom's Policies and with information regarding how the applicable Client's proxies were voted. To obtain this information, please mail a written request to: InvestorServices@axiom-investors.com.

The Policies are designed to reasonably ensure that Axiom votes proxies in the best interest of Clients for which it has voting authority. The Polices describe how Axiom addresses material conflicts between its interests and those of its Clients with respect to proxy voting.

Conflicts between Axiom's interests and those of its Clients may raise concerns regarding the effect the conflict may have on how Axiom votes proxies. Axiom typically addresses any material conflicts of interest by (a) relying on the pre-determined voting guidelines outlined in the Policies; (b) using the recommendations of an independent third party; or (c) disclosing material conflicts to the Clients and obtaining the consent of the Clients before voting. In the event that Axiom becomes aware of

a conflict of interest between Axiom and ISS, Axiom will make an independent decision on how to vote, which may or may not be consistent with ISS guidelines.

A few of Axiom's clients have designated proxy voting responsibilities to Axiom while simultaneously requiring Axiom to vote the client proxies in accordance with a specific client voting policy. For these clients, although Axiom is voting the proxies, the recorded vote will be in accordance with the client's requested policy and may not match the discretionary vote that Axiom is able to make in other accounts.

Item 18: Financial Information

Financial Condition

Axiom is not aware of any financial impairment that would preclude Axiom from meeting its contractual commitments to its Clients.

Item 19: Requirements for State-Registered Advisers

Not applicable.



Firm Brochure Supplement

(Part 2B of Form ADV)

Axiom Investors LLC

33 Benedict Place

Greenwich, CT 06830

203-422-8000

axiom-investors.com

This brochure supplement provides information about the following supervised persons:

Bradley Amoils Yogesh Borkar, CFA¹ Dean Bumbaca, CFA1 Lindsay R. Chamberlain Donald Elefson, CFA¹ Jonathan S. Ellis, CFA¹ Matthew A. Franco, CFA¹ Steve Hanson Andrew H. Jacobson, CFA¹ David S. Kim, CFA¹ Young Kim Siobhan Kranz, CFA¹ Donald K. Miller José Gerardo Morales, CFA¹ Gregory Schneider Megan Strater

The information contained in this brochure supplement supplements the Axiom Investors LLC ("Axiom") brochure. You should have received a copy of that brochure. Please contact Axiom's compliance group (email: compliancegroup@axiom-investors.com) if you did not receive the Axiom brochure or if you have any questions about the contents of this supplement.

March 27, 2024

¹ See the last page of this brochure supplement for information about the qualifications required to obtain and maintain the Chartered Financial Analyst ("CFA") designation.

Brochure Supplement (Part 2B of Form ADV)

Bradley Amoils Portfolio Manager

Year of Birth: 1963

Educational Background:

- Columbia Business School, MBA, Finance and International Business concentration, 1995
- University of Witwatersrand Medical School, MD equivalent degree, 1988
- University of Witwatersrand, BS, Laboratory Medicine and Immunology, 1985

Business Experience:

- Axiom, Since 2002
 - Portfolio Manager (Global Equity, Concentrated Global Growth, International Equity)
- American Century Investment Management, 1997 2002
 - o Portfolio Manager
- Oppenheimer Funds, Inc., 1996 1997
 - Securities Analyst

Disciplinary Information: None
Other Business Activities: None
Additional Compensation: None

Yogesh Borkar, CFA Portfolio Manager

Year of Birth: 1966

Educational Background

- Yale University, Master of Business Administration, 1996
- University of Bombay, Bachelor of Commerce. Business Management, 1986

Business Experience:

- Axiom, Since 2013
 - Portfolio Manager (International Micro/Small Cap Equity, Global Small Cap Equity)
- Fidelity Investments (FMR) / Pyramis Global Advisors, 2005 2012
 - o Associate Portfolio Manager
- DuPont Capital Management, 2001 2005
 - Senior Research Analyst

Dean Bumbaca, CFA Associate Portfolio Manager

Year of Birth: 1986

Educational Background

- The Wharton School, University of Pennsylvania, MBA, Finance, 2022
- B.B.A., School of Business, University of Wisconsin-Madison, 2010

Business Experience:

- Axiom, Since 2010
 - o Associate Portfolio Manager (International Equity) 2022-present
 - o Analyst, 2017-2022
 - o Research Associate, 2012-2017
 - o Trading Assistant, 2012
 - o Operations Associate, 2010-2012

Disciplinary Information: None
Other Business Activities: None
Additional Compensation: None

Lindsay R. Chamberlain Managing Director of Client Partnerships

Year of Birth: 1981

Educational Background:

 Virginia Polytechnic Institute and State University, BS, Management Science & Information Technology, 2004

Business Experience:

- Axiom, Since 2013
 - Managing Director of Client Partnerships
- Artio Global Investors, 2008 2013
 - Vice President and Director of Institutional Investments
- Bear Stearns, a Division of JPMorgan, 2007 2008
 - o Investor Relations

Donald Elefson, CFA Portfolio Manager

Year of Birth: 1959

Educational Background:

University of Washington, BA, Economics, 1982

Business Experience:

- Axiom, Since 2012
 - Portfolio Manager (Emerging Markets Equity)
- Harding Loevner, 2008 2011
 - Portfolio Manager (Emerging Markets Portfolio)
- US Trust, 1999 2007
 - Managing Director / Portfolio Manager (Emerging Markets Fund)
- Smith Barney Asset Management, 1994 1998
 - Portfolio Manager (Emerging Markets Equity)

Disciplinary Information: None
Other Business Activities: None
Additional Compensation: None

Jonathan S. Ellis, CFA Director of Research / Portfolio Manager

Year of Birth: 1976

Educational Background:

- Columbia Business School, Columbia University, MBA 2006
- Lafayette College, BA, Economics, with honors 1998

Business Experience:

- Axiom, Since 2011
 - Director of Research / Portfolio Manager (Concentrated Global Growth)
- Bank of America Merrill Lynch, 1999 2011
 - o Director, Senior Equity Analyst
- Pershing LLC, 1998-1999
 - Associate

Matthew A. Franco, CFA Portfolio Manager

Year of Birth: 1973

Educational Background:

Saint John's University, BS, Finance, 1996

Business Experience:

- Axiom, Since 1998
 - Portfolio Manager (Global and International Small/Micro Cap Equity,
 U.S. Small Cap Equity, Global Small Cap Equity)
- Columbus Circle Investors, a unit of PIMCO Advisors LP, 1998
 - Analyst (International Fund)
- R.L. Renck & Co., Inc., 1996 1998
 - Research Associate

Disciplinary Information: None
Other Business Activities: None
Additional Compensation: None

Steve Hanson Director of Client Partnerships

Year of Birth: 1981

Educational Background:

- Raymond A. Mason School of Business, College of William & Mary, MBA, 2017
- University of Central Florida, BS, Business Administration Economics, 2004

Business Experience:

- Axiom, Since 2015
 - o Director of Client Partnerships
- American Century 2013-2015
 - VP, Institutional Consultant Relations
- Lord Abbet & Company 2004 2012
 - o Director of Public Fund Services

Andrew H. Jacobson, CFA Portfolio Manager, Chief Executive Officer, Chief Investment Officer

Year of Birth: 1966

Educational Background:

- University of Pennsylvania, The Wharton School, MBA, Finance & Marketing, 1993
- Université De Paris, La Sorbonne, French, 1989
- Princeton University, BA, Molecular Biology, 1988

Business Experience:

- Axiom, Since 1998
 - Portfolio Manager (International Equity, Concentrated Global Growth, Emerging Markets World, Emerging Markets, Global Equity)
 - o Chief Investment Officer leader of Axiom's investment team
 - Managing Director
- Columbus Circle Investors, a unit of PIMCO Advisors LP, 1993 1998
 - Executive Vice President (International Fund)

Disciplinary Information: None
Other Business Activities: None
Additional Compensation: None

David S. Kim, CFA Portfolio Manager

Year of Birth: 1976

Educational Background:

 Georgetown University, BS Business Administration, Finance & International Business, 1998

Business Experience:

- Axiom, Since 2005
 - Portfolio Manager (U.S. Small Cap Equity, Concentrated Global Growth, Global Small Cap Equity)
- Pinnacle Associates Ltd., 2002 2005
 - Analyst (International Equities Division)
- Morgan Stanley, 2000 2002
 - o Associate, Institutional Equities Division Prime Brokerage

Young K. Kim Portfolio Manager

Year of Birth: 1977

Educational Background:

- Harvard Business School, Master of Business Administration, 2006
- Massachusetts Institute of Technology, M.E. Electrical Engineering & Computer Science, 2000
- Massachusetts Institute of Technology, BS Computer Science, 1999

Business Experience:

- Axiom, Since 2021
 - Portfolio Manager (Emerging Markets Equity)
- Columbia Threadneedle Investments, 2011-2021
 - o Senior Vice Portfolio Manager, Global Emerging Markets
- Marathon Asset Management, 2010-2011
 - o Senior Vice President, Asia Equity
- 360IP, INC, 2009-2011
 - Vice President, Investments/ Advisor
- Galleon Asia Investments, 2006-2009
 - o Vice President, Technology Analyst and Portfolio Manager

Disciplinary Information: None Other Business Activities: None Additional Compensation: None

Siobhan Kranz, CFA

Director of Client Partnerships

Year of Birth: 1981

Educational Background:

Binghamton University, State University of New York, B.S., Management 2003

Business Experience:

- Axiom, Since 2024
 - Director of Client Partnerships
- Echo Street, 2019 2023
 - Director of Investor Relations
- Eaton Vance, 2017 2019
 - o Director, Institutional Business Development
- Stone Harbor Investment Partners, 2013 2017
 - Client Relationship Manager
- Artio Global Investors, 2006 2013
 - Director of Institutional Investments
- AllianceBernstein, 2003 2006
 - Associate Portfolio Manager, 2005 –2006
 - Sales Associate, 2003 2005

Donald K. Miller Chairman

Year of Birth: 1932

Educational Background:

- Harvard Business School, MBA, Finance 1959
- Cornell University, BS, 1954

Business Experience:

- Axiom, Since 1998
 - o Chairman
- Greylock Financial, 1987 1998
 - Chairman and CEO

Disciplinary Information: None Other Business Activities: None Additional Compensation: None

José Gerardo Morales, CFA Portfolio Manager

Year of Birth: 1967

Educational Background:

- Georgetown University, MBA, 1995
- George Mason University, BS, Finance, 1989

Business Experience:

- Axiom, Since 2017
 - Portfolio Manager (Emerging Markets Equity, Emerging Markets World)
- Mirae Asset Global Investment (USA), 2010 2016
 - o Portfolio Manager / CIO
- Mirae Asset Global Investment (UK), 2007 2010
 - Head of EM/Deputy CIO, LatAM & EMEA
- Pictet Asset Management, 2006 2007
 - Head of Emerging European Equities

Gregory Schneider Director of Client Partnerships

Year of Birth: 1983

Educational Background:

University of Michigan B.B.A., Finance & Accounting 2006

Business Experience:

- Axiom, Since 2021
 - Director of Client Partnerships
- GQG Partners 2017 2021
 - o Managing Director of Consultant Relations 2019-2021
 - o Director of Business Development 2017-2019
- Pacific Current Group 2016 2017
 - Director of Business Development
- Aberdeen Asset Management 2009-2016
 - o Consultant Relations Manager
- Pacific Investment Management Company 2010-2012
 - Senior Account Associate

Disciplinary Information: None Other Business Activities: None Additional Compensation: None

Megan Strater

Director of Client Partnerships

Year of Birth: 1983

Educational Background:

Rutgers University B.A., English & Spanish 2006

Business Experience:

- Axiom, Since 2021
 - Director of Client Partnerships
- Bridgewater Associates 2011 2021
 - o Consultant Relations Lead 2018-2021
 - o Marketing Associate 2016-2018
 - Client Service Coordinator 2011-2016
- White Deer Energy 2007 2011
 - Chief of Staff

Supervision

Each person named in this brochure supplement is subject to the supervision of the Chief Investment Officer and founder of Axiom, Andrew H. Jacobson, who can be reached at 203-422-8000.

In addition, Axiom has adopted a compliance program and Code of Ethics that governs all employees, including each person named in this brochure supplement. All Axiom employees are required to affirm in writing that he or she has received, read, and understands the Code of Ethics as well as accompanying supplemental documents, including Axiom's Insider Trading Policy, Gifts and Entertainment Policy, Employee Handbook Acknowledgement Form, Bad Actor Questionnaire and Internet, Email and Related Communication Systems Usage Policy. Axiom's Chief Compliance Officer is responsible for supervising the compliance program.

Professional Certifications

<u>Chartered Financial Analyst (CFA)</u>: Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requires:

- A bachelor's degree from an accredited institution or equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfillment of society requirements, which vary by society. Unless you are
 upgrading from affiliate membership, all societies require two sponsor
 statements as part of each application; these are submitted online by your
 sponsors.
- Adherence to, and execution of, the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.