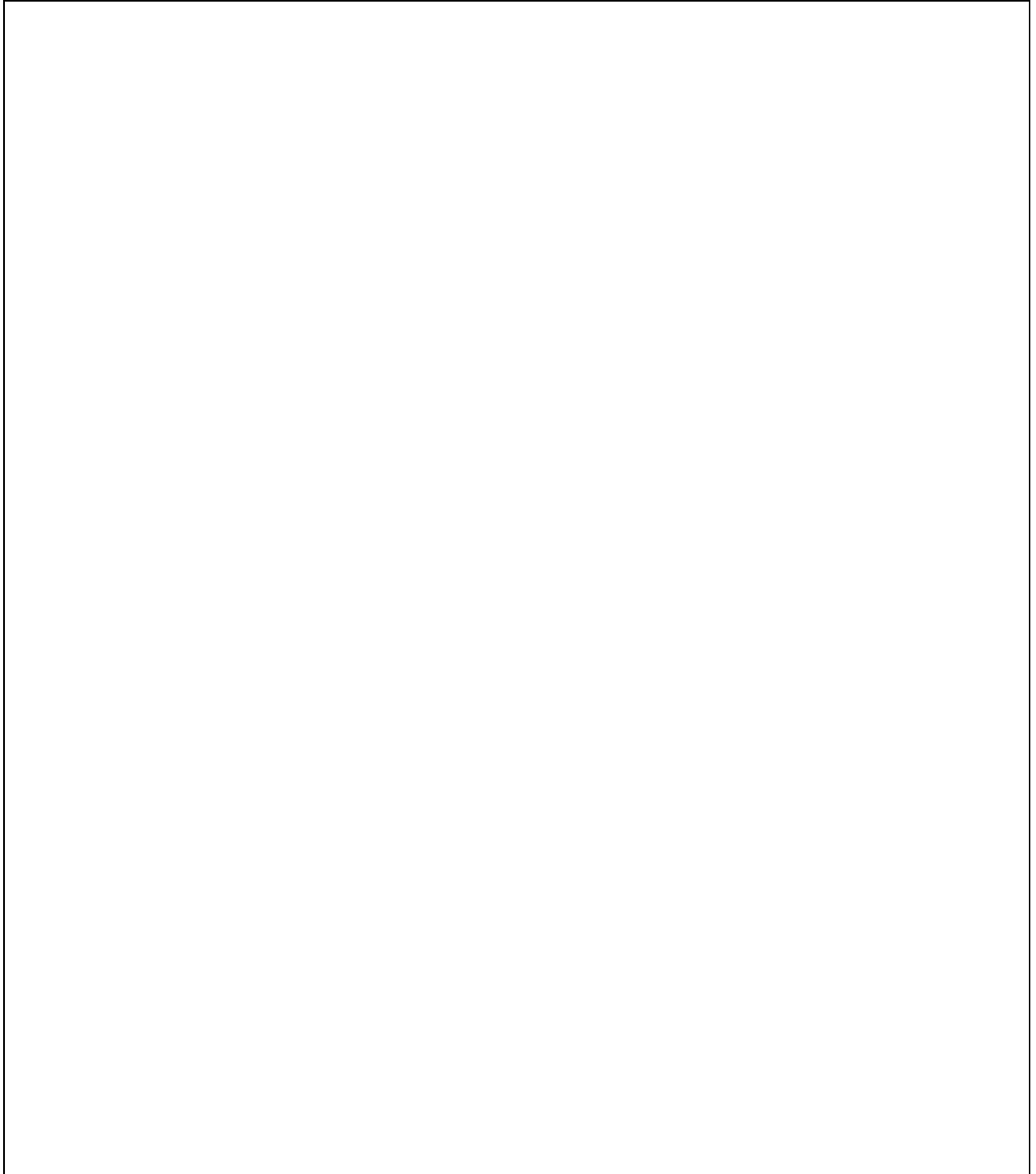


Part 2A of Form ADV: Firm *Brochure*

Item 1 Cover Page

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Item 2 Material Changes

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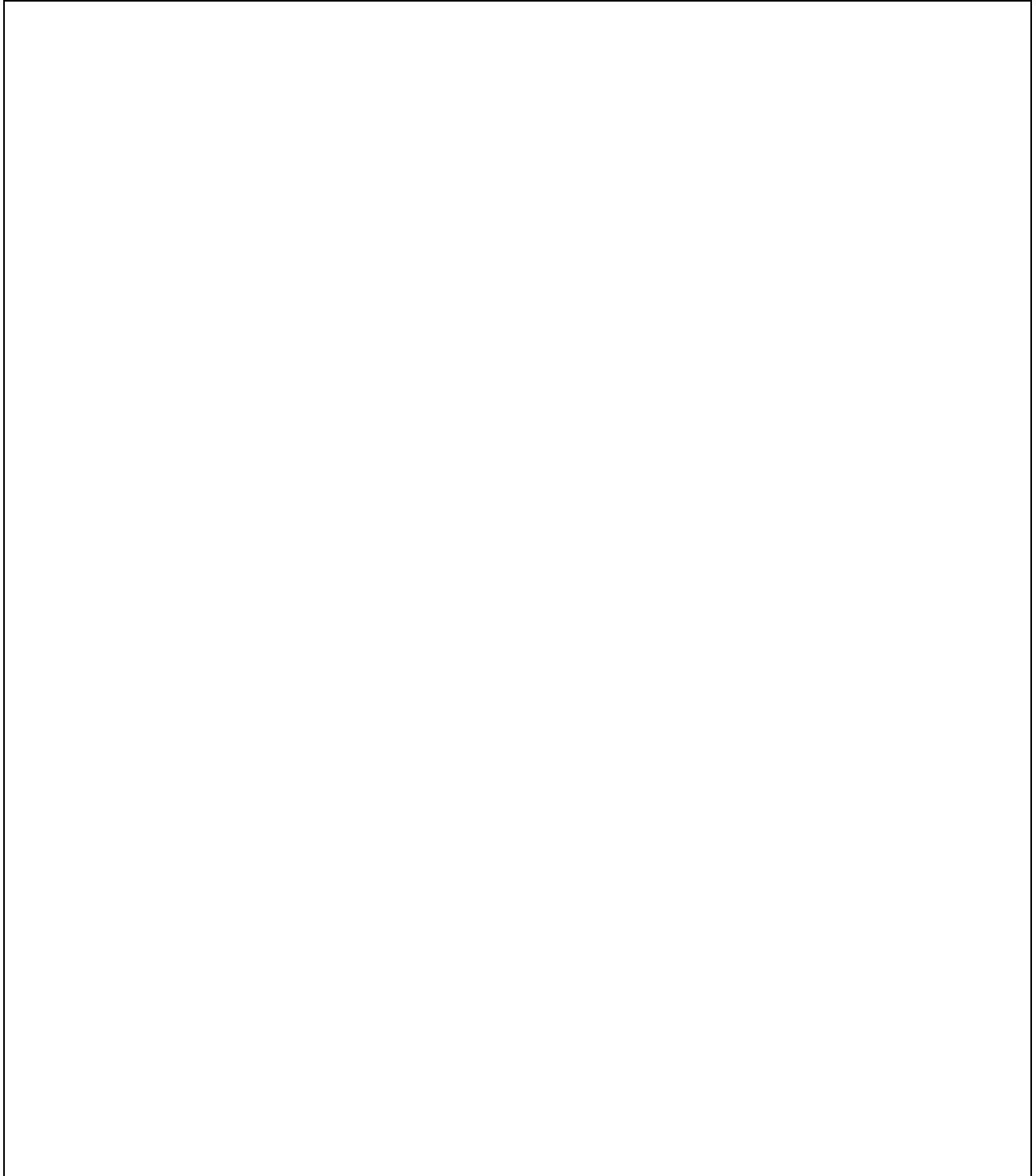
Item 4 Advisory Business

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Item 5 Fees and Compensation

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



Item 7 Types of *Clients*

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

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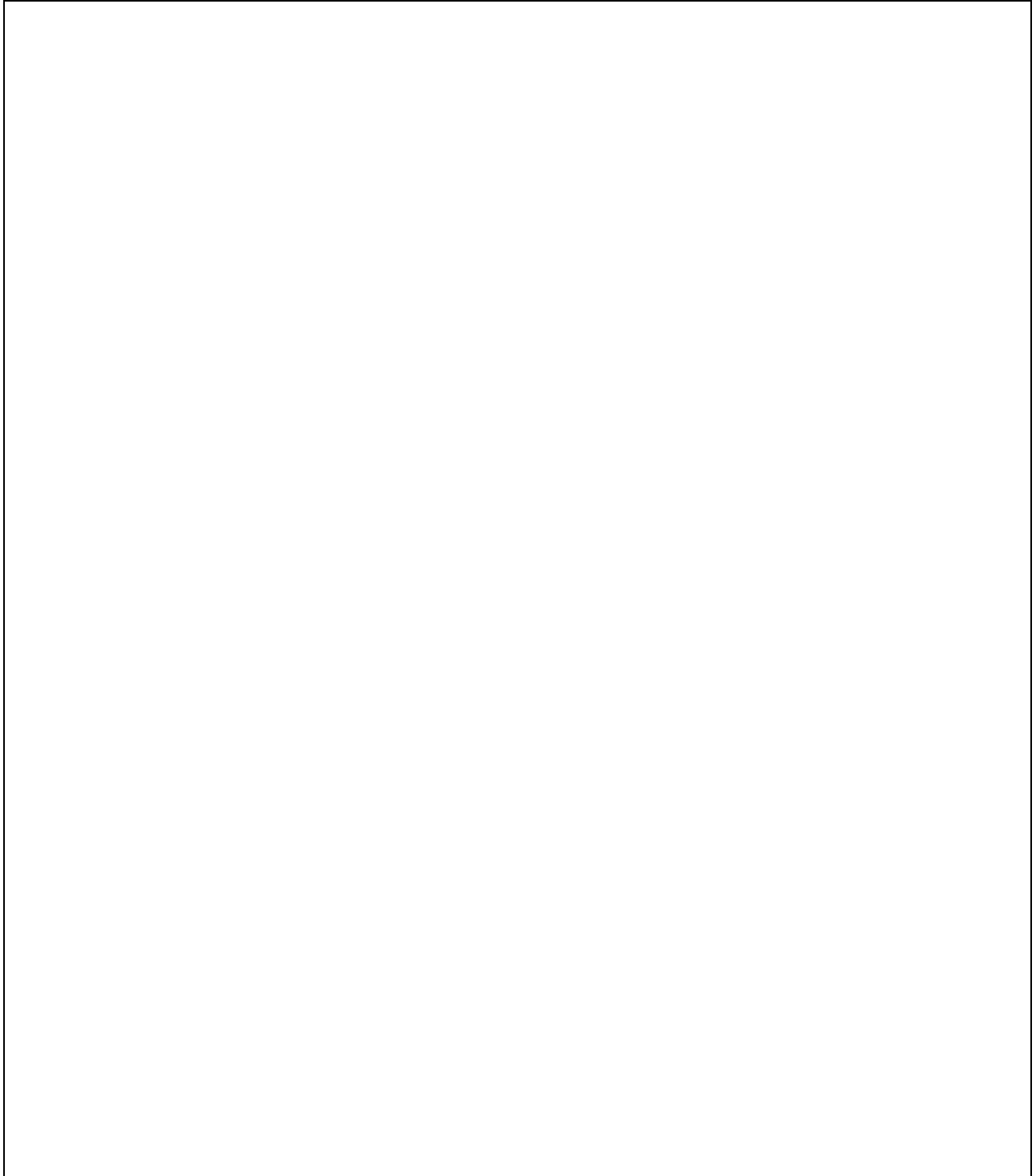
Item 9 Disciplinary Information

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Item 10 Other Financial Industry Activities and Affiliations

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

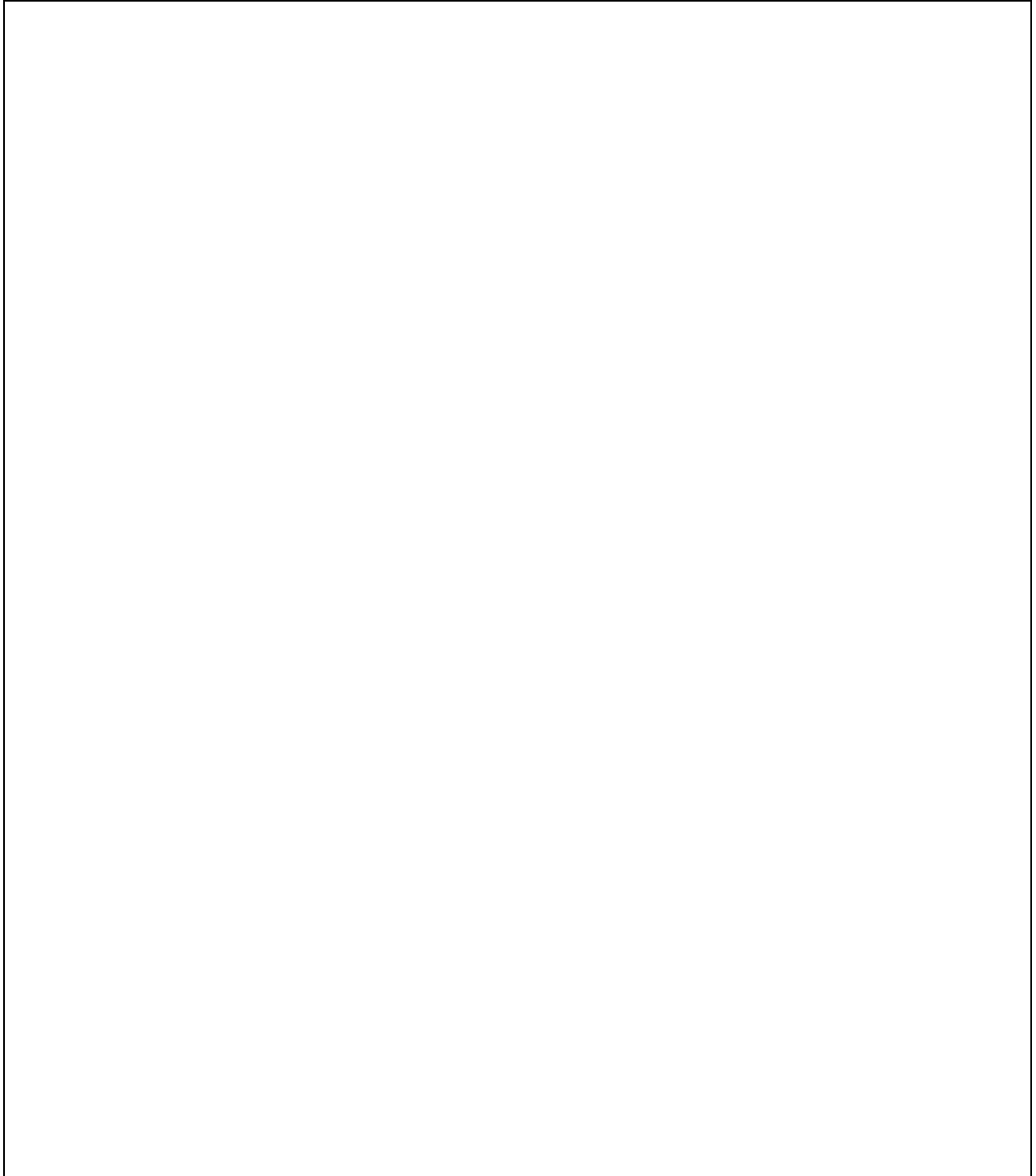
Item 12 Brokerage Practices

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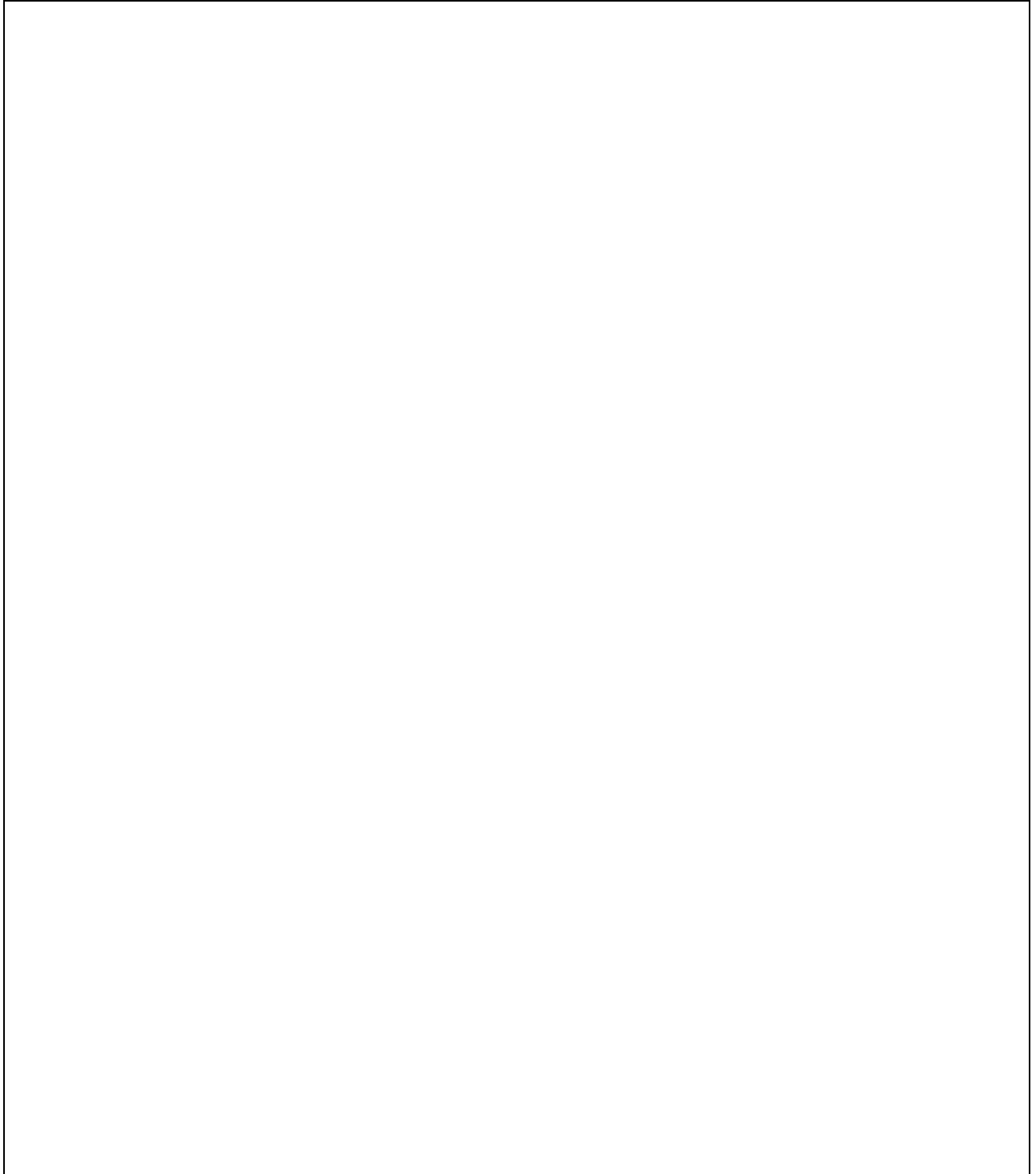
Item 13 Review of Accounts

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Item 14 *Client* Referrals and Other Compensation



Item 15 *Custody*

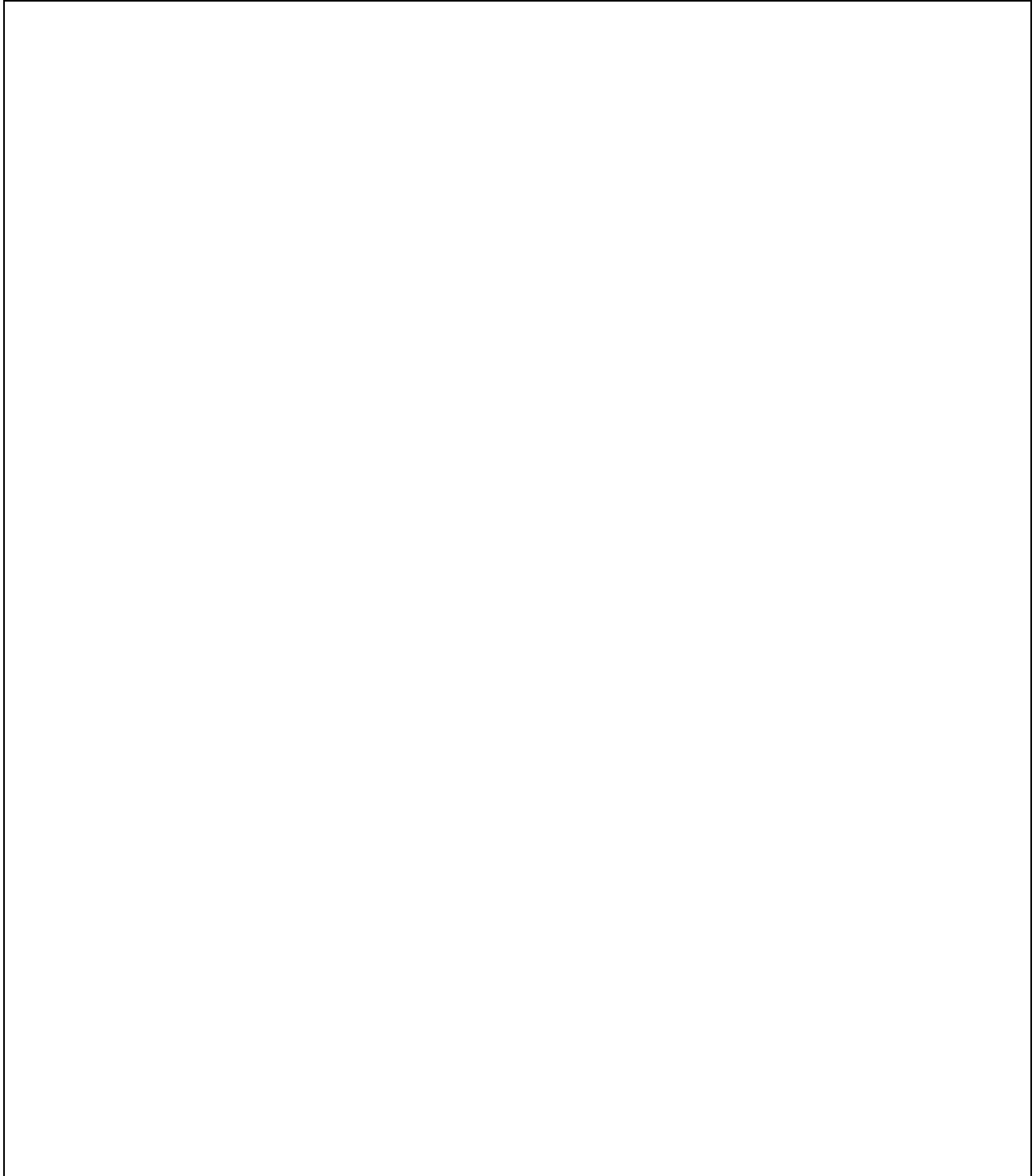


Item 16 Investment Discretion

Item 17 Voting *Client* Securities

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Item 18 Financial Information

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Item 19 Requirements for State-Registered Advisers

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