FORM ADV

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

Primary Business Name: SENDERO WEALTH MANAGEMENT, LLC

Annual Amendment - All Sections

3/20/2025 10:06:43 AM

	this form updated by filing periodic amendments. Se			cation, revocation of your registration, or criminal prosecution. You must keep
	n 1 Identifying Information			
	ponses to this Item tell us who you are, where you are doing b vided for the <i>filing adviser</i> only. General Instruction 5 provides	•		rou are filing an umbrella registration, the information in Item 1 should be abrella registration.
A.	Your full legal name (if you are a sole proprietor, your last, fit SENDERO WEALTH MANAGEMENT, LLC	rst, and middle	names):	
В.	(1) Name under which you primarily conduct your advisory b SENDERO WEALTH MANAGEMENT, LLC	usiness, if diffe	rent from Item 1.A.	
	List on Section 1.B. of Schedule D any additional names under	er which you co	nduct your advisory busine	SS.
	(2) If you are using this Form ADV to register more than one	investment adv	viser under an <i>umbrella reg</i>	$gistration$, check this box \square
	If you check this box, complete a Schedule R for each relying	adviser.		
C.	If this filing is reporting a change in your legal name (Item 1 \Box your legal name or \Box your primary business name:	.A.) or primary	business name (Item 1.B.(1)), enter the new name and specify whether the name change is of
D.	(1) If you are registered with the SEC as an investment advis			
	(2) If you report to the SEC as an exempt reporting adviser,			
	(3) If you have one or more Central Index Key numbers assign	gned by the SEG	C ("CIK Numbers"), all of yo No Information Filed	our CIK numbers:
E.	(1) If you have a number ("CRD Number") assigned by the F	INRA's CRD sys	stem or by the IARD system	n, your <i>CRD</i> number: 145594
	If your firm does not have a CRD number, skip this Item 1.E.	Do not provide	e the CRD number of one of	f your officers, employees, or affiliates.
	(2) If you have additional CRD Numbers, your additional CRD	numbers:		
			No Information Filed	
F.	registration, or are registered, with one or more state se	curities authori	ities, you must list all of you	ZIP+4/Postal Code: 78209 , at which you conduct investment advisory business. If you are applying for ur offices in the state or states to which you are applying for registration or with
	whom you are registered. If you are applying for SEC re the largest twenty-five offices in terms of numbers of en			he SEC, or if you are reporting to the SEC as an exempt reporting adviser, list tly completed fiscal year.
	(2) Days of week that you normally conduct business at you	r <i>principal offic</i>	e and place of business:	
	© Monday - Friday [®] Other: 8:30 A.M. TO 5:00 P.M. MC Normal business hours at this location: 8:30 A.M 3:30 P.M. FRIDAY (3) Telephone number at this location: 210-805-0171 (4) Facsimile number at this location, if any: 210-805-0577 (5) What is the total number of offices, other than your <i>prin</i> completed fiscal year?			you conduct investment advisory business as of the end of your most recently
C	3	hi	- d du	
G.	Mailing address, if different from your <i>principal office and pla</i>	ce oi business a		
	Number and Street 1: City: State:		Number and Street 2: Country:	ZIP+4/Postal Code:
	If this address is a private residence, check this box: \Box			
н.	If you are a sole proprietor, state your full residence address,	. if different froi	m your <i>principal office and</i>	place of business address in Item 1.F.:

CRD Number: 145594 Rev. 10/2021

	·	State: or accounts on publicly available	Country:	ZIP+4/Postal Code:	Yes	N-
	·	or accounts on publicly available	o cocial modia platforms (including		Yes	
	If "yes," list all firm website addres		e social media piadornis (including,	but not limited to, Twitter, Facebook and LinkedIn)?	•	C
	serves as a portal through which to need to list more than one portal a	o access other information you haddress. Do not provide the addre	ave published on the web, you may esses of websites or accounts on pul	able social media platforms on Section 1.I. of Schedule D. If a willist the portal without listing addresses for all of the other inform blicly available social media platforms where you do not control to e accounts on publicly available social media platforms.	ation. You n	nay
	Chief Compliance Officer (1) Provide the name and contact i Compliance Officer, if you have one			eporting adviser, you must provide the contact information for yo	our Chief	
	Name:		Other titles, if any:			
	JULIE GERRON Telephone number:		GENERAL COUNSEL Facsimile number, if any:			
	210-805-0171 Number and Street 1:		210-805-0577 Number and Street 2:			
	250 W. NOTTINGHAM City:	State:	SUITE 300 Country:	ZIP+4/Postal Code:		
	SAN ANTONIO	Texas	United States	78209		
	Electronic mail (e-mail) address, if JGERRON@SENDERO.COM	·				
	Act of 1940 that you advise for pro Name:	viding chief compliance officer s		ed person or an investment company registered under the Inves name and IRS Employer Identification Number (if any):	tment Comp	any
	IRS Employer Identification Numbe	er:				
	Additional Regulatory Contact Perso provide that information here.	on: If a person other than the Cl	hief Compliance Officer is authorized	to receive information and respond to questions about this Form	n ADV, you n	nay
	Name: ELIZABETH CRAWFORD		Titles: CEO			
	Telephone number: 210-930-9407		Facsimile number, if any: 210-805-0171			
	Number and Street 1: 250 W. NOTTINGHAM		Number and Street 2: SUITE 300			
	City: SAN ANTONIO	State: Texas	Country: United States	ZIP+4/Postal Code: 78209		
	Electronic mail (e-mail) address, if ECRAWFORD@SENDERO.COM	f contact person has one:				
ı	Do you maintain come or all of the	books and records you are requ	ired to keep under Section 204 of th	a Advisors Act, or similar state law computers other than your		No
L.	principal office and place of busines		irea to keep under Section 204 of th	e Advisers Act, or similar state law, somewhere other than your	0	•
	If "yes," complete Section 1.L. of S	ichedule D.			Vaa	N.
М.	Are you registered with a foreign fi	nancial regulatory authority?			res C	No ⊙
	Answer "no" if you are not register	ed with a foreign financial regula	atory authority, even if you have an	affiliate that is registered with a foreign financial regulatory auth	ority. If "yes	5,"
	complete Section 1.M. of Schedule	D.			Yes	No
N.	Are you a public reporting company	y under Sections 12 or 15(d) of	the Securities Exchange Act of 1934	?	0	⊚
0.	Did you have \$1 billion or more in a	assets on the last day of your m	ost recent fiscal year?			No ⊙
	If yes, what is the approximate am \$1 billion to less than \$10 billi	•			·	
	C \$1 billion to less than \$10 billion to less than \$50 billion to less					
	C \$50 billion or more					
	For purposes of Item 1.O. only, "as on the balance sheet for your most		, rather than the assets you manage	on behalf of clients. Determine your total assets using the total	assets show	n
Р.	Provide your <i>Legal Entity Identifier</i>	if you have one:				
	A <i>legal entity identifier</i> is a unique	number that companies use to i	dentify each other in the financial m	arketplace. You may not have a legal entity identifier.		

		No Information Filed	
SECTION 1.F. Other Offices			
	ion. If you are applying for SEC re		ou conduct investment advisory business. You must complete a with the SEC, or if you are an exempt reporting adviser, list only the
Number and Street 1:		Number and Street 2:	
200 CONGRESS AVENUE		SUITE 904	
City:	State:	Country:	ZIP+4/Postal Code:
AUSTIN	Texas	United States	78701
If this address is a private residence, check this	s box: \square		
Telephone Number:	Facsimile Num	ther if any	
210-930-9407	racsimile Num	iber, ii driy.	
If this office location is also required to be regist Office Registration Form (Form BR), please pro-		•	ation for a broker-dealer or investment adviser on the Uniform Brand
How many <i>employees</i> perform investment advi	isory functions from this office loca	ation?	
Are other business activities conducted at this of	office location? (check all that app	ly)	
(1) Broker-dealer (registered or unregistered	d)		
\square (2) Bank (including a separately identifiable	department or division of a bank)		
(3) Insurance broker or agent	,		
(4) Commodity pool operator or commodity	trading advisor (whether registere	ed or exempt from registration)	
(f) Commodity poor operator or commodity [5] Registered municipal advisor	truding davisor (whether registere	a or exempe from registration)	
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> business	s activities conducted from this off	fice location:	
	ion. If you are applying for SEC re		ou conduct investment advisory business. You must complete a with the SEC, or if you are an exempt reporting adviser, list only the
Number and Street 1: 1580 SOUTH MAIN STREET		Number and Street 2: SUITE 203	
City: BOERNE	State: Texas	Country: United States	ZIP+4/Postal Code: 78006
	s how.		
If this address is a private residence, check this	S DOX.		
Telephone Number:	Facsimile Num	nber, if any:	
Telephone Number: 210-930-9407	Facsimile Num		
Telephone Number: 210-930-9407	Facsimile Num stered with FINRA or a <i>state secur</i>	ities authority as a branch office loc	ation for a broker-dealer or investment adviser on the Uniform Bran

Are other business activities conducted at this office location? (check all that apply)

- \square (1) Broker-dealer (registered or unregistered)
- \square (2) Bank (including a separately identifiable department or division of a bank)
- $\ \square$ (3) Insurance broker or agent
- \square (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- \square (5) Registered municipal advisor
- \square (6) Accountant or accounting firm
- \square (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

THE CFO AND DIRECTOR OF DUE DILIGENCE WORK OCCASIONALLY/PART TIME FROM THIS OFFICE AND FROM TIME TO TIME WILL MEET WITH ADVISORY CLIENTS AT THIS LOCATION.

Complete the following information for each office, other than you separate Schedule D Section 1.F. for each location. If you are app largest twenty-five offices (in terms of numbers of <i>employees</i>).				
Number and Street 1: 1245 W. MONTANA STREET		Number and Street 2:		
City: CHICAGO	State: Illinois	Country: United States	ZIP+4/Postal Code: 60614	
If this address is a private residence, check this box: \Box				
Telephone Number:	Facsimile N	umber, if any:		
210-805-0171		,		
If this office location is also required to be registered with FINRA of Office Registration Form (Form BR), please provide the <i>CRD</i> Brand			e location for a broker-dealer or investment ad	viser on the Uniform Branch
How many $\it employees$ perform investment advisory functions from 1	n this office	location?		
Are other business activities conducted at this office location? (che \square (1) Broker-dealer (registered or unregistered) \square (2) Bank (including a separately identifiable department or divi \square (3) Insurance broker or agent				
\square (4) Commodity pool operator or commodity trading advisor (where \square (5) Registered municipal advisor \square (6) Accountant or accounting firm \square (7) Lawyer or law firm	nether regist	ered or exempt from registration)		
Describe any other investment-related business activities conduct	ed from this	office location:		
ECTION 1.I. Website Addresses				
List your website addresses, including addresses for accounts on p and/or LinkedIn). You must complete a separate Schedule D Secti				ited to, Twitter, Facebook
Address of Website/Account on Publicly Available Social Media Plat	tform: htt	ps://SENDEROWEALTHMANAGEME	NT.COM	
Address of Website/Account on Publicly Available Social Media Plat	tform: htt	ps://SENDERO.COM		
Address of Website/Account on Publicly Available Social Media Plat	tform: htt	ps://SENDERO.COM/SERVICES/WO	DMEN-AND-WEALTH	
Address of Website/Account on Publicly Available Social Media Plat	tform: htt	ps://SENDERO.COM/SERVICES/FA	MILY-LEGACY/	
Address of Website/Account on Publicly Available Social Media Plat	tform: htt	ps://SENDERO.COM/SERVICES/IN	VESTMENT-MANAGEMENT/	
Address of Website/Account on Publicly Available Social Media Plat	tform: htt	ps://SENDERO.COM/SERVICES/FA	MILY-OFFICE/	
Address of Website/Account on Publicly Available Social Media Plat	tform: HT	TPS://TWITTER.COM/SENDEROWE	ALTH	
Address of Website/Account on Publicly Available Social Media Plat	tform: HT	TPS://WWW.LINKEDIN.COM/COMP	ANY/SENDEROWEALTHMANAGEMENT	
Address of Website/Account on Publicly Available Social Media Plat	tform: htt	ps://www.instagram.com/sendero	w.m?utm_source=ig_web_button_share_sheel	t&igsh=ZDNIZDc0MzIxNw==
Address of Website/Account on Publicly Available Social Media Plat	tform: htt	ps://www.facebook.com/profile.ph	p?id=61556632891519	
Address of Website/Account on Publicly Available Social Media Pla	tform: htt	ps://SENDERO.COM/SERVICES/FA	MILY-FOUNDATIONS/	

SECTION 1.L. Location of Books and Records

No Information Filed

SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

Item	2 S	EC R	egistration/Reporting			
					e SEC. Complete this Item 2.A. only if you are the information in Item 2 should be provided	e applying for SEC registration or submitting a for the <i>filing adviser</i> only.
A.	you affir	r SEC mativ			s 2.A.(1) through 2.A.(12), below. If you are s .A.(13). Part 1A Instruction 2 provides inform	submitting an <i>annual updating amendment</i> to lation to help you determine whether you may
	V	(1)	are a large advisory firm that eith	her:		
			(a) has regulatory assets under ma	anagement of \$100 million (in U.S. dollars) or	more; or	
			(b) has regulatory assets under mathematics the SEC;	anagement of \$90 million (in U.S. dollars) or	more at the time of filing its most recent annu	ual updating amendment and is registered with
		(2)	are a mid-sized advisory firm that are either:	at has regulatory assets under management o	of \$25 million (in U.S. dollars) or more but les	s than \$100 million (in U.S. dollars) and you
			(a) not required to be registered as	s an adviser with the state securities authority	y of the state where you maintain your <i>princip</i>	pal office and place of business; or
			(b) not subject to examination by t	the state securities authority of the state whe	re you maintain your principal office and place	e of business;
			Click HERE for a list of states in	n which an investment adviser, if registered,	would not be subject to examination by the st	tate securities authority.
		(3)	Reserved			
		(4)	have your principal office and place	of business outside the United States;		
		(5)	are an investment adviser (or se	ubadviser) to an investment company reg	gistered under the Investment Company Act o	f 1940;
		(6)		company which has elected to be a busine ection, and you have at least \$25 million of re	ess development company pursuant to sec egulatory assets under management;	tion 54 of the Investment Company Act of
		(7)	are a pension consultant with res	spect to assets of plans having an aggregate	value of at least \$200,000,000 that qualifies f	or the exemption in rule 203A-2(a);
		(8)		203A-2(b) that <i>controls</i> , is <i>controlled</i> by, or is usiness is the same as the registered adviser;	under common control with, an investment a	dviser that is registered with the SEC, and
			If you check this box, complete Sec	ction 2.A.(8) of Schedule D.		
		(9)	are an adviser relying on rule 203	A-2(c) because you expect to be eligible fo	r SEC registration within 120 days;	
			If you check this box, complete Sec	ction 2.A.(9) of Schedule D.		
		(10)	are a multi-state adviser that is r	required to register in 15 or more states and i	is relying on rule 203A-2(d);	
			If you check this box, complete Sec	ction 2.A.(10) of Schedule D.		
		(11)	are an Internet adviser relying or	n rule 203A-2(e);		
			If you check this box, complete Sec	ction 2.A.(11) of Schedule D.		
		(12)	have received an SEC order exen	npting you from the prohibition against regist	ration with the SEC;	
		,	If you check this box, complete Sec			
		(13)	are no longer eligible to remain r			
	_	(13)	are no longer engible to remain r	egistered with the SLC.		
Stat	te Se	ecurit	ties Authority Notice Filings and	State Reporting by Exempt Reporting Ad	visers	
C.	If the	ed <i>not</i> nis is a nis is a seque	tice filings. In addition, exempt repo an initial application or report, check an amendment to direct your notice	rting advisers may be required to provide sta the box(es) next to the state(s) that you wo filings or reports to additional state(s), check he SEC. If this is an amendment to your regis		s and any amendments they file with the SEC. quent filings or reports you submit to the SEC. uld like to receive notice of this and all
	Jur	isdict	ions			
		AL		☑ IL	□ NE	□ sc
		AK		□ IN	□ NV	□ SD
		AZ		□ IA □ KS	☑ NH	□ TN
		AR CA		□ ks	□ NJ ☑ MM	☑ TX ☐ UT
		СО		☑ LA	□ NY	□ vī
		СТ		□ ME	□ NC	□ vi
		DE		□ MD	□ ND	□ VA
		DC		□ ма	□ он	□ wa
		FL		□ мі	□ ок	□ wv
		GA		□ MN	□ OR	□ wi
		GU		□ MS	□ PA	□ wy

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

□ RI

SECTION 2.A.(8) Related Adviser

□ ID

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

□ мт

Name of Registered Investment Adviser
CRD Number of Registered Investment Adviser
SEC Number of Registered Investment Adviser -
SECTION 2.A.(9) Investment Adviser Expecting to be Eligible for Commission Registration within 120 Days
If you are relying on rule 203A-2(c), the exemption from the prohibition on registration available to an adviser that expects to be eligible for SEC registration within 120 days, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations:
I am not registered or required to be registered with the SEC or a state securities authority and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.
☐ I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.
SECTION 2.A.(10) Multi-State Adviser
If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.
If you are applying for registration as an investment adviser with the SEC, you must make both of these representations:
I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the state securities authorities in those states.
I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the state securities authorities of those states.
If you are submitting your annual updating amendment, you must make this representation:
Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the state securities authorities in those states.
SECTION 2.A.(11) Internet Adviser
If you are relying on rule 203A-2(e), the Internet adviser exemption from the prohibition on registration, you are required to make a representation about your eligibility for SEC
registration. By checking the appropriate box, you will be deemed to have made the required representation.
If you are applying for registration as an investment adviser with the SEC or changing your existing Item 2 response regarding your eligibility for SEC registration, you must make this representation:
I will provide investment advice on an ongoing basis to more than one client exclusively through an operational interactive website.
If you are filing an annual updating amendment to your existing registration and are continuing to rely on the Internet adviser exemption for SEC registration, you must make this representation:
I have provided and will continue to provide investment advice on an ongoing basis to more than one client exclusively through an operational interactive website.
CECTION 2.8 /12) CEC Evamphina Order
SECTION 2.A.(12) SEC Exemptive Order If you are relying upon an SEC order exempting you from the prohibition on registration, provide the following information:
ar you are relying upon an See order exempting you from the promotion on registration, provide the following information.
Application Number: 803-
Date of order:

Item 3 Form of Organization

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

- A. How are you organized?
 - C Corporation
 - C Sole Proprietorship
 - C Limited Liability Partnership (LLP)
 - C Partnership
 - ← Limited Liability Company (LLC)
 - C Limited Partnership (LP)
 - 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?
 DECEMBED
- C. Under the laws of what state or country are you organized?

State Country

Texas United States

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

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

Item 4 Successions

Yes No

A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?

0 0

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

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.

42

- 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?
 - 0
 - (5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?
 - 0
 - (6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?

2

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

- (2) Approximately what percentage of your clients are non-United States persons?
 1%
- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

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

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

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

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

Type of Client	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)	102		\$ 34,744,844
(b) High net worth individuals	209		\$ 3,267,009,570
(c) Banking or thrift institutions	0		\$
(d) Investment companies	0		\$
(e) Business development companies	0]	\$
(f) Pooled investment vehicles (other than investment companies and business development companies)	0		\$
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	1	V	\$ 3,849,330
(h) Charitable organizations	25		\$ 2,405,235,010
(i) State or municipal government entities (including government pension plans)	0		\$
(j) Other investment advisers	0		\$
(k) Insurance companies	0		\$
(I) Sovereign wealth funds and foreign official institutions	0		\$
(m) Corporations or other businesses not listed above	7		\$ 112,315,704
(n) Other:	0		\$

Compensation Arrangements

E.	9:07 AM			tions [User Name: bgrou	up239,	OrgID: 145594]	
		ted for your investment advisory services		:			
	(1) A perce	entage of assets under your management	Ī				
		ption fees (for a newsletter or periodical))				
	person .	ees (other than subscription fees)					
	☐ (5) Commi ☐ (6) <i>Perforn</i>						
		specify):					
		bout Your Advisory Business - Regulander Management	atory Assets Under Man	nagement			
Keg	ulatory Assets O	der Planagement					Yes N
		e continuous and regular supervisory or r					© 0
	(2) If yes, what is	the amount of your regulatory assets un		Il number of accounts?			
			U.S. Dollar Amount			Total Number of Accounts	
	Discretionary		(a) \$ 1,918,499,984			1,172	
	Non-Discretio		(b) \$ 3,904,654,474 (c) \$ 5,823,154,458		(e)	1,842	
	iotai.	((c) \$ 5,025,154,456		(1)	1,042	
	Part 1A Instru	ction 5.b. explains how to calculate your	regulatory assets under n	nanagement. You must follow	w these ii	nstructions carefully when completing this Item.	
	(3) What is the ap	proximate amount of your total regulator	ry assets under managem	ent (reported in Item 5.F.(2)((c) above	e) attributable to <i>clients</i> who are non- <i>United States</i> p	persons?
tom		bout Your Advisory Business - Adviso	ony Activities				
	isory Activities	Jour Your Advisory Business - Advisor	ory Activities				
		dvisory services do you provide? Check a	II that apply.				
	✓ (1) Financi	al planning services					
		o management for individuals and/or smanagement for investment companies		velonment companies" that h	ave mad	e an election pursuant to section 54 of the Investme	int
	Compa	ny Act of 1940)			ave maa	e un cicción pursuant to section si or the investine	
					registere	d investment companies and other pooled investmer	nt
		consulting services					
		on of other advisers (including <i>private fui</i>	nd managers)				
	and the same of th	tion of periodicals or newsletters y ratings or pricing services					
	_ ` '	timing services					
		onal seminars/workshops					
	(12) Other(s	pecify):					
	Act of 1940, include	ding as a subadviser. If you check Item 5				nent company registered under the Investment Com ny or investment companies to which you provide ac	
	Section 5.G.(3) of	Schedule D.					
H.	•	ncial planning services, to how many clie	ents did you provide these	services during your last fisca	cal year?		
	0 0						
	0 1-10						
	O 11 - 25 O 26 - 50						
	© 51 - 100						
	O 101 - 250						
	C 251 - 500						
	C More than 50						
		500, how many? nearest 500)					
	T	ha bhia Thana E II ada na hèir alada na Ilalia					
	in your responses	to this Item 3.m., do not include as the	nts the investors in a priv	rate Tunu you auvise, umess y	you nave	a separate advisory relationship with those investor	
	(1) Do you partici	pate in a <i>wrap fee program</i> ?					Yes N
τ.	(2) If markinin	ate in a wrap fee program, what is the ar	mount of your regulatory a	assets under management att	tributable	e to acting as:	
I.	(2) II you particip	a wrap fee program					
ī .	(a) sponsor to	, , ,					
I.	(a) <i>sponsor</i> to \$	anager for a wrap fee program?					
I.	(a) <i>sponsor</i> to \$ (b) portfolio m		o fee program?				
I.	(a) sponsor to \$ (b) portfolio m \$ (c) sponsor to \$	anager for a wrap fee program?		l(a) or Item 5.I.(2)(b).			
	(a) sponsor to \$ (b) portfolio m \$ (c) sponsor to \$ If you report an a.	anager for a wrap fee program? and portfolio manager for the same wrap	hat amount in Item 5.I.(2)		d informa	tion in Section 5.I.(2) of Schedule D	

	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 through a wrap fee pro not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2).	gram	, ao	
		Yes	s No	0
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?	⊚	C	,
	(2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management?	•	С	,
K.	Separately Managed Account <i>Clients</i>	Yes	s No	0
	(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>)?	•	С	,
	If yes, complete Section 5.K.(1) of Schedule D.			
	(2) Do you engage in borrowing transactions on behalf of any of the separately managed account clients that you advise?	0	•	5
	If yes, complete Section 5.K.(2) of Schedule D.			
	(3) Do you engage in derivative transactions on behalf of any of the separately managed account <i>clients</i> that you advise?	0	•	5
	If yes, complete Section 5.K.(2) of Schedule D.			
	(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?	•	С	,
	If yes, complete Section 5.K.(3) of Schedule D for each custodian.			
L.	Marketing Activities	Yes	s No	0
L.	(1) Do any of your <i>advertisements</i> include:	Yes	s No	0
L.		Yes	c No	
L.	(1) Do any of your advertisements include:			,
L.	(1) Do any of your <i>advertisements</i> include: (a) Performance results?	•	С	5
L.	(1) Do any of your <i>advertisements</i> include: (a) Performance results? (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	© 0	c @	0
L.	(1) Do any of your <i>advertisements</i> include: (a) Performance results? (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? (c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	© ©	0
L.	(1) Do any of your <i>advertisements</i> include: (a) Performance results? (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? (c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	© 0 0	C @ @	
L.	(1) Do any of your <i>advertisements</i> include: (a) Performance results? (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? (c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (e) Third-party ratings? (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	0 0 0	c @ @	
L.	(1) Do any of your <i>advertisements</i> include: (a) Performance results? (b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))? (c) <i>Testimonials</i> (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (d) <i>Endorsements</i> (other than those that satisfy rule 206(4)-1(b)(4)(ii))? (e) <i>Third-party ratings</i> ? (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 testimonials, endorsements, or third-party ratings?		c @ @	

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

No Information Filed

SECTION 5.I.(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.

(a)	Asset Type	Mid-year	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"

Asset Type	End of year
(i) Exchange-Traded Equity Securities	45 %
(ii) Non Exchange-Traded Equity Securities	0 %
(iii) U.S. Government/Agency Bonds	1 %
(iv) U.S. State and Local Bonds	6 %
(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	33 %
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	11 %
(xi) Cash and Cash Equivalents	4 %
(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	(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.

(ii) End of Year

Gross Notional Exposure	(1) Regulatory Assets Under Management								
			(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

Com	iplete a	ı separate S	chedule [O Section	5.K.(3)	for each	custodia	n that	holds te	n percent	or more	of your	· aggregate	e separatel	y managed	account reg	gulatory	assets und	ler manager	nent.

(a) Legal name of custodian:

PERSHING LLC

(b) Primary business name of custodian:

PERSHING LLC

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

City: State: Country: JERSEY CITY New Jersey United States

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)

8 - 17574

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

\$ 3,912,924,995

(a) Legal name of custodian:

BOFA SECURITIES, INC.

(b) Primary business name of custodian:

BOFA SECURITIES, INC.

(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

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)

8 - 69787

- (f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its legal entity identifier (if any)
- (g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian? \$ 778 874 295

20/2	5, 9:0	7 AM	IARD - All Sections [User Name: bgroup239, OrgID: 145594]
Ite	em 6 C	ther Business Activities	
In	this It	em, we request information about your firm's other business ac	ctivities.
A.		are actively engaged in business as a (check all that apply): (1) broker-dealer (registered or unregistered) (2) registered representative of a broker-dealer (3) commodity pool operator or commodity trading advisor (4) futures commission merchant (5) real estate broker, dealer, or agent (6) insurance broker or agent (7) bank (including a separately identifiable department or trust company (9) registered municipal advisor (10) registered security-based swap dealer (11) major security-based swap participant (12) accountant or accounting firm (13) lawyer or law firm (14) other financial product salesperson (specify):	
	If y	ou engage in other business using a name that is different from	n the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D.
B	(1)	Are you actively engaged in any other business not listed in I	Yes No (tem 6.Δ. (other than giving investment advice)?
.		If yes, is this other business your primary business?	
	(2)		O @
		If "yes," describe this other business on Section 6.B.(2) of Sc	chedule D, and if you engage in this business under a different name, provide that name. Yes No
	(3)	Do you sell products or provide services other than investmen	
		If "yes," describe this other business on Section 6.B.(3) of Sc	chedule D, and if you engage in this business under a different name, provide that name.
SE	CTION	6.A. Names of Your Other Businesses	
			No Information Filed
SE	CTION	6.B.(2) Description of Primary Business	
De	escribe	your primary business (not your investment advisory business):
If	you er	gage in that business under a different name, provide that nan	ne:
SE	CTION	6.B.(3) Description of Other Products and Services	
PF	RIVATE		it products and services that you listed in Section 6.B.(2) above. ASSETS, RISK AND FAMILY OFFICE MANAGEMENT, FAMILY FOUNDATION MANAGEMENT, MULTI-GENERATIONAL OMEN'S NEEDS SURROUNDING WEALTH.
If	vou er	gage in that business under a different name, provide that nan	ne:

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

clier	its.	,	
A.		•	of Item 7 requires you to provide information about you and your related persons, including foreign affiliates. Your related persons are all of your advisory affiliates and any at is under common control with you.
	•		·
	You	nave	a <i>related person</i> that is a (check all that apply):
	V	(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)
	_		

futures commission merchant

banking or thrift institution

(9) trust company

(10) accountant or accounting firm П

(11) lawyer or law firm

П (12) insurance 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 Auvisers Act.
SE	ECTION 7.A. Financial Industry Affiliations
Со	omplete a separate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.
1.	Legal Name of <i>Related Person</i> : SENDERO SECURITIES, LLC
2.	Primary Business Name of <i>Related Person</i> : SENDERO SECURITIES, LLC
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 8 - 67834 or Other
4.	Related Person's (a) CRD Number (if any): 146627 (b) CIK Number(s) (if any):
	No Information Filed
5.	Related Person is: (check all that apply) (a)
	(n) real estate broker or dealer (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles

20/25, 9:07	AM IARD - All Sections [User Name: bgroup239, OrgID: 145594]		
		Yes	No
6. Do you	control or are you controlled by the related person?	0	•
7. Are yo	u and the <i>related person</i> under common <i>control</i> ?	•	0
8. (a) D	oes the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•
0	you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not perationally independent (pursuant to rule 206(4)-2(d)(5)) from the related person and thus are not required to obtain a surprise examination for your clients' funds or ecurities that are maintained at the related person?	0	Õ
11	you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i> assets: Number and Street 2:		
III .	City: State: Country: ZIP+4/Postal Code: f this address is a private residence, check this box:		
	The state as a superior of the state and solver and sol	Yes	No
9. (a) It	the related person is an investment adviser, is it exempt from registration?	0	•
(b) If	the answer is yes, under what exemption?		
10. (a) Is	the related person registered with a foreign financial regulatory authority ?	0	•
(b) It	the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed		
11. Do you	and the related person share any supervised persons?	•	0
12. Do you	and the related person share the same physical location?	•	c
Item 7 Pri	vate Fund Reporting		
		Yes	No
B. Are you	an adviser to any <i>private fund</i> ?	0	⊙
Instructi adviser	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 on 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-reports 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 subacomplete Section 7.B.(2) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.	-	
	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 ion, 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 r	name.	
SECTION 7	.B.(1) Private Fund Reporting		
	No Information Filed		
SECTION 7	.B.(2) Private Fund Reporting		
	No Information Filed		

Item 8 Participation or Interest in Client Transactions

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

ike Itom 7. Itom 9 requires you to provide information about you and your related persons, including foreign affiliates

Like	Item	n 7, Item 8 requires you to provide information about you and your <i>related persons</i> , including foreign affiliates.		
Pro	priet	tary Interest in <i>Client</i> Transactions		
A.	Do y	you or any related person:	Yes	No
	(1)	buy securities for yourself from advisory clients, or sell securities you own to advisory clients (principal transactions)?	0	•
	(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	0
Sal	es In	sterest in <i>Client</i> Transactions		
В.	Do y	you or any related person:	Yes	No
	(1)	as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	•
	(2)	recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	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.	Do y	you or any related person have discretionary authority to determine the:	Yes	No
	(1)	securities to be bought or sold for a <i>client's</i> account?	•	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?	0	•
D.	If yo	ou answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	0
E.	Do y	you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ?	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?	•	О
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</i> 's regular salary)?		Ö
I.		you or any related person, including any employee, directly or indirectly, receive compensation from any person (other than you or any related person) for client reals?	0	•
	In y	our response to Item 8.1., do not include the regular salary you pay to an employee.		
		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 received from (in answer) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.	ring It	tem:

120,	5.07 AIVI	IAND - All dections [user Name, byloup255, Orgin, 145554]		
tem 9	Custody			
	Item, we ask you whether you or a <i>related person</i> ha and about your custodial practices.	as <i>custody</i> of <i>client</i> (other than <i>clients</i> that are investment companies registered under the Investment Company Act	of 1940)
Α. (Do you have <i>custody</i> of any advisory <i>clients'</i> :		Yes	No
	(a) cash or bank accounts?		•	0
	(b) securities?		•	\circ
С		er "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from a felient assets in connection with advisory services you provide to clients, but you have overcome the presumption that rule 206(4)-2(d)(5)) from the related person.		are
(2) If you checked "yes" to Item 9.A.(1)(a) or (b), wh	hat is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for which you have <i>custody</i> :		
	U.S. Dollar Amount	Total Number of <i>Clients</i>		
	(a) \$ 993,176,000	(b) 173		
t	nose assets and the number of those clients in your re	ou have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the esponse to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you p number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2)	rovide i	
В. (In connection with advisory services you provide t	to clients, do any of your related persons have custody of any of your advisory clients':	Yes	No
	(a) cash or bank accounts?		0	\odot
	(b) securities?		0	⊚
Υ	ou are required to answer this item regardless of how	you answered Item 9.A.(1)(a) or (b).		
(If you checked "yes" to Item 9.B.(1)(a) or (b), wh custody:	hat is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for which your <i>related persons</i>	have	
	U.S. Dollar Amount	Total Number of <i>Clients</i>		
	(a) \$	(b)		
(A qualified custodian(s) sends account statements An independent public accountant audits annually investors in the pools. An independent public accountant conducts an annual public accountant conducts and annual public accountant conducts and annual public accountant conducts an annual public accountant conducts and accountant conducts are conducted and accountant conducts are conducted and accountant conducts and accountant conducts are conducted accountant conducts and accountant conducted accountant conducts are conducted accountant conducts and accountant conducts are conducted accountant conducts and accountant conducted accountant conducted accountant conducted accountant conducted accountant conducted accountant conducted accountan	nds or securities in connection with advisory services you provide to <i>clients</i> , check all the following that apply: is at least quarterly to the investors in the pooled investment vehicle(s) you manage. the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the nual surprise examination of <i>client</i> funds and securities. ernal control report with respect to custodial services when you or your <i>related persons</i> are qualified custodians for		
r	you checked Item 9.C.(2), C.(3) or C.(4), list in Sect	ion 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal c to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the pr		
D. [o you or your related person(s) act as qualified custoo	dians for your clients in connection with advisory services you provide to clients?	Yes	No
(you act as a qualified custodian		0	\odot
(your related person(s) act as qualified custodian(s) 	s)	О	•
		is that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule $206(4)-2(b)(1)$) must ly whether you have determined the related person to be operationally independent under rule $206(4)-2$ of the Advisers		
	you are filing your <i>annual updating amendment</i> and MM/YYYY) the examination commenced:	you were subject to a surprise examination by an independent public accountant during your last fiscal year, provide	:he date	е
	our <i>clients</i> in connection with advisory services you pr	nds or securities, how many <i>persons</i> , including, but not limited to, you and your <i>related persons,</i> act as qualified cust rovide to <i>clients?</i>	odians	for
ECTI	ON 9.C. Independent Public Accountant			
		No Information Filed		
		No Information Filed		

Item 10 Control Persons

In this Item, we ask you to identify every person that, directly or indirectly, controls you. If you are filing an umbrella registration, the information in Item 10 should be provided for the filing adviser only.

If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.

Yes No

A. Does any person not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, control your management or policies?

0 0

If yes, complete Section 10.A. of Schedule D.

B. If any person named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

SECTION 10.A. Control Persons

No Information Filed

SECTION 10.B. Control Person Public Reporting Companies

Item 11 Disclosure Information

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

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

If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.B.(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 orders, judgments, or decrees lapsed.

You	must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.		
		Yes	No
Do	any of the events below involve you or any of your supervised persons?	0	\odot
For	"yes" answers to the following questions, complete a Criminal Action DRP:		
A.	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) to charges that are constitutions.	urrent	y
	pending.		
R	In the past ten years, have you or any advisory affiliate:		
D.	(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</i> -	_	_
	related business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit	. 0	⊚
	any of these offenses?		
	(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) to charges that are considered.	urrenti	y
	pending.		
For	"yes" answers to the following questions, complete a Regulatory Action DRP:		
	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	0
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?		
	(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	0	•
	restricted?	0	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	0	•
	(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	•
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?	0	\odot
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	0	•
	(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	0	•
	restricted?		
	(4) in the past ten years, entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with an <i>investment-related</i> activity?	0	⊙
	(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	⊙
	associating with an investment related business of restricted your of any advisory animates accounty.		
E.	Has any self-regulatory organization or commodities exchange ever:		
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	•
	(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	0	•
	by the SEC)?		
	(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	0	⊚
	restricted? (4) disciplined you or any <i>advisory affiliate</i> by expelling or suspending you or the <i>advisory affiliate</i> from membership, barring or suspending you or the <i>advisory affiliate</i>	_	_
	from association with other members, or otherwise restricting you 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 advisory affiliate now the subject of any regulatory proceeding that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.?	0	•
For	"yes" answers to the following questions, complete a Civil Judicial Action DRP:		
н.	(1) Has any domestic or foreign court:	Yes	No
	(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	0	•
	(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	0	•
	(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against you or any advisory affiliate by a state or foreign financial	0	•
	regulatory authority?		
	(2) Are you or any advisory affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?	0	⊚

Item 12 Small Businesses

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC **and** you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

• Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).

	 Control means the power to direct or cause the direction of the management or policies of a person, whether through ownership of securities, by contract, or otherwise. An 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 the other person. 		
		Yes	No
A.	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?	О	О
	(2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	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?	О	О
	(2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?	0	0

Schedule A

Direct Owners and Executive Officers

- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:
 - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
 - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);
 - Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
 - (c) if you are organized as a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
 - (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
 - (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
- 3. Do you have any indirect owners to be reported on Schedule B? $\,^{\circ}$ O Yes $\,^{\circ}$ No
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
- 5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: NA less than 5% B 10% but less than 25% D 50% but less than 75%
 - A 5% but less than 10% C 25% but less than 50% E 75% or more
- 7. (a) In the Control Person column, enter "Yes" if the person has control as defined in the Glossary of Terms to Form ADV, and enter "No" if the person does not have control. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are control persons.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last	DE/FE/I	Title or Status	Date Title or Status	Ownership	Control	PR	CRD No. If None: S.S. No. and Date of
Name, First Name, Middle Name)			Acquired MM/YYYY	Code	Person		Birth, IRS Tax No. or Employer ID No.
SENDERO PARTNERS, LLC	DE	SOLE MEMBER	08/2012	E	Υ	N	45-5117752
HART, EDWARD, AUSTIN	I	PRESIDENT	08/2017	NA	Υ	N	2215591
CRAWFORD, ELIZABETH, FLAVIN	I	CHIEF EXECUTIVE OFFICER	08/2017	NA	Y	N	3235803
CRAIG, KRISTINA, GUDER	I	CFO	03/2022	NA	Υ	N	6768439
GERRON, JULIE, K	I	CHIEF COMPLIANCE OFFICER	04/2023	NA	Y	N	4525156

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, 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.

Schedule D - Miscellaneous

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

Schedule R
No Information Filed

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

Part 2

Exemption from brochure delivery requirements for SEC-registered advisers

SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to all of your advisory clients, you do not have to prepare a brochure.

Yes No

Are you exempt from delivering a brochure to all of your clients under these rules?

If no, complete the ADV Part 2 filing below.

Amend, retire or file new brochures:

Brochure ID	Brochure Name	Brochure Type(s)
338623	SENDERO WEALTH - FORM ADV PART 2.	High net worth individuals, Pension plans/profit sharing plans,
	BROCHURE - AUGUST 2020	Foundations/charities, Other institutional, Selection of Other
		Advisers/Solicitors, Individuals



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

 JULIE GERRON
 03/20/2025

 Printed Name:
 Title:

JULIE GERRON CHIEF COMPLIANCE OFFICER

Adviser *CRD* Number: 145594

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:

145594

Privacy | Legal | Terms & Conditions