



Meeting Details

Date	4.17.2014	Meeting Type	Document Review
Summit Analyst	Analyst Name	Firm Representatives	John Jones – Investor Relations
Firm / GP	XYZ Inc.		

Product Overview & Fund Terms

Investment Manager	XYZ Inc.		
Fund Name	XYZ Fund		
Strategy	Risk Parity	Hurdle Rate	No
Fund Size	\$4200 MM	Minimum Inv.	\$5 MM
Fund Cap	Open	Minimum additional	\$100,000
Internal Capital	\$93.56 mm	Inv. frequency	Monthly
Management Fee	0.40%	Lock Up	None
Incentive Fee	0%	Redemption frequency	Monthly
Organizational Expense	N/A	Notification to redeem	15 Days
High Water Mark	No	Gates	None

Discussion Details

Purpose	<ul style="list-style-type: none"> To complete an internal review of Form ADV Part 1 and 2 filed with the Securities and Exchange Commission ("SEC") on March 3, 2014 and February 28, 2014 respectively. The filings were signed by Bill Jones, chief legal officer, and disclosed a settlement of a regulatory action in October of 2013 that related to futures trading; please see the Regulatory Action section below for greater detail on this matter.
Notes	<p>General</p> <ul style="list-style-type: none"> There were no Form ADV-E reports filed. Form ADV-E is filed if: there is a surprise examination by an independent public accountant; when the accountant resigns, is dismissed, or is otherwise terminated from the engagement; and if the accountant removes itself or is removed from consideration or reappointment. AUM increased to \$12,263,986,000 from \$5,522,142,248 in 2010. (Page 4) XYZ has discretionary assets under management ("AUM") of \$137,047,244,473 across 212 accounts as of December 31, 2013. XYZ has approximately 400 employees, 151 of which perform investment advisory functions. XYZ or a related person directly or indirectly compensates other parties for client referrals. <p>Regulatory Action</p> <ul style="list-style-type: none"> XYZ disclosed three regulatory actions in their Form ADV filing, all of which were brought against them by CME Group, Inc. and relate to futures trading. <ul style="list-style-type: none"> The first action alleges that as of the close of business on September 6, 2012, XYZ violated futures contract position limits set by the CME Group in connection with the trading of European Gasoil bullet futures. This action was settled on March 27, 2013 when XYZ paid a monetary fine of \$25,000 to the New York Mercantile Exchange. The second action alleges that as of the close of business on January 15, 2013, XYZ violated futures contract position limits set by the CME Group in connection with the

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	<p>trading of crude oil financial futures. This action was settled on March 27, 2013 when XYZ paid a monetary fine of \$60,000 to the New York Mercantile Exchange.</p> <ul style="list-style-type: none">○ The third action alleges that as of the close of business on April 17, 2013, XYZ violated futures contract position limits set by the CME Group in connection with the trading of soybean futures. This action was settled on October 24, 2013 when XYZ paid \$70,000 to the Chicago Board of Trade and disgorgement of \$925. <p>Ownership</p> <ul style="list-style-type: none">• The chief compliance officer was added as a direct owner in August of 2013 with an ownership percentage of less than 5%.• Mr. A and Ms. B were both added as direct owners in January of 2014 with an ownership percentage of less than 5%. A and B are both principals. <p>Schedule D</p> <ul style="list-style-type: none">• Registration with Foreign Financial Regulatory Authorities:<ul style="list-style-type: none">○ Canada - Ontario Securities Commission○ India - Securities and Exchange Board of India• Financial Industry Affiliations:<ul style="list-style-type: none">○ CNH Partners, LLC• Due to the large size of the organization, XYZ has a wide offering of private funds listed on their Form ADV. Thirteen of these funds are noted as wholly-owned by related persons of XYZ. A complete list of XYZ's funds can be provided upon request. <p>SEC Material Changes</p> <ul style="list-style-type: none">• None noted. <p>Part 2B</p> <ul style="list-style-type: none">• The founding principal is now is a member of a Family Board. This position does not provide a substantial source of income or involve a substantial amount of his time.• Mr. C was added to Form 2B.
<p><u>Comments</u></p>	<ul style="list-style-type: none">• Follow up regarding third regulatory action from CME Group Inc. When did XYZ become aware of this violation? What steps have been taken to prevent this issue from occurring again?• Request clarification from XYZ regarding what arrangements they have in place with third parties for compensation for client referrals.• Who is the related SEC registered investment adviser mentioned in the miscellaneous section of Schedule D (CNH?)• Obtain additional information regarding funds highlighted above that are internal capital only.