

## Exhibit 6.01 Books & Records Requirements

### Retention of Financial & Accounting Records

Description of Record	Retention Requirement
A journal or journals, including cash receipts and disbursements, records, and any other records of original entry forming the basis of entries in any ledger. See Rule 204-2(a)(1)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
General and auxiliary ledgers (or other comparable records) reflecting asset, liability, reserve, capital, income, and expense accounts. See Rule 204-2(a)(2)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
All check books, bank statements, cancelled checks and cash reconciliations of the investment adviser. See Rule 204-2(a)(4)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
All bills or statements (or copies thereof), paid or unpaid, relating to the business of the investment adviser as such. See Rule 204-2(a)(5)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
All trial balances, financial statements, and internal audit working papers relating to the business of such investment adviser. See Rule 204-2(a)(6)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

### Retention of Investment Advice & Transaction Related Records

*Every investment adviser subject to paragraph (a) of this section who renders any investment supervisory or management service to any client shall, with respect to the portfolio being supervised or managed and to the extent that the information is reasonably available to or obtainable by the investment adviser, make and keep true, accurate and current:*

Description of Record	Retention Requirement
A memorandum of each order given by the investment adviser for the purchase or sale of any security, of any instruction received by the investment adviser concerning the purchase, sale, receipt, or delivery of a particular security, and of any modification or cancellation of any such order or instruction. See Rule 204-2(a)(3)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
Records showing separately for each such client the securities purchased and sold, and the date, amount, and price of each such purchase and sale. See Rule 204-2(c)(1)(i)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
For each security in which any such client has a current position, information from which the investment adviser can promptly furnish the name of each such client, and the current amount or interest of such client. See Rule 204-2(c)(1)(ii)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

### Retention of Investment Authority Records

Description of Record	Retention Requirement
A list or other record of all accounts in which the investment adviser is vested with any discretionary	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

power with respect to the funds, securities, or transactions of any client. See Rule 204-2(a)(8)	
All powers of attorney and other evidence of the granting of any discretionary authority by any client to the investment adviser, or copies thereof. See Rule 204-2(a)(9)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
All written agreements (or copies thereof) entered into by the investment adviser with any client or otherwise relating to the business of such investment adviser as such. See Rule 204-2(a)(10)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

Retention of Advertising & Performance Records
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Description of Record	Retention Requirement
<p>Originals of all written communications received and copies of all written communications sent by such investment adviser relating to (i) any recommendation made or proposed to be made and any advice given or proposed to be given, (ii) any receipt, disbursement or delivery of funds or securities, (iii) the placing or execution of any order to purchase or sell any security or (iv) predecessor performance (as defined in § 275.206(4)-1(e)(12)) and the performance or rate of return of any or all managed accounts, portfolios (as defined in §275.206(4)-1(e)(11)), or securities recommendations: <i>Provided, however, (a)</i> That the investment adviser shall not be required to keep any unsolicited market letters and other similar communications of general public distribution not prepared by or for the investment adviser, and <i>(b)</i> that if the investment adviser sends any notice, circular or other advertisement (as defined in § 275.206(4)-1(e)(1) offering any report, analysis, publication or other investment advisory service to more than 10 persons, the investment adviser shall not be required to keep a record of the names and addresses of the persons to whom it was sent; except that if such notice, circular or advertisement is distributed to persons named on any list, the investment adviser shall retain with the copy of such notice, circular or advertisement a memorandum describing the list and the source thereof. See Rule 204-2(a)(7)</p>	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
<p>A copy of each (A) Advertisement (as defined in § 275.206(4)-1(e)(1) of this chapter) that the investment adviser disseminates, directly or indirectly, except: (1) For oral advertisements, the adviser may instead retain a copy of any written or recorded materials used by the adviser in connection with the oral advertisement; and (2) For compensated oral testimonials and endorsements (as defined in § 275.206(4)-1(e)(17) and (5) of this chapter), the adviser may instead make and keep a record of the disclosures provided to clients or</p>	Five (5) years, with the first two (2) years in an appropriate office of the investment adviser, from the end of the fiscal year during which the investment adviser last published or otherwise disseminated, directly or indirectly, the notice, circular, advertisement, newspaper article, investment letter, bulletin, or other communication. See Rule 204-2(e)(3)(i)

<p>investors pursuant to § 275.206(4)-1(b)(1) of this chapter; and (B) Notice, circular, newspaper article, investment letter, bulletin, or other communication that the investment adviser disseminates, directly or indirectly, to ten or more persons (other than persons associated with such investment adviser); and (C) If such notice, circular, advertisement, newspaper article, investment letter, bulletin, or other communication recommends the purchase or sale of a specific security and does not state the reasons for such recommendation, a memorandum of the investment adviser indicating the reasons therefor; and (ii) A copy of any questionnaire or survey used in the preparation of a third-party rating included or appearing in any advertisement in the event the adviser obtains a copy of the questionnaire or survey. See Rule 204-2(a)(11)(i)-(ii)</p> <p>A copy of each notice, circular, advertisement, newspaper article, investment letter, bulletin or other communication that the investment adviser circulates or distributes, directly or indirectly, to 10 or more persons (other than persons connected with such investment adviser), and if such notice, circular, advertisement, newspaper article, investment letter, bulletin or other communication recommends the purchase or sale of a specific security and does not state the reasons for such recommendation, a memorandum of the investment adviser indicating the reasons therefor. See Rule 204-2(a)(11)</p>	
<p>A copy of each brochure, brochure supplement and Form CRS, and each amendment or revision to the brochure, brochure supplement and Form CRS, that satisfies the requirements of Part 2 or Part 3 of Form ADV, as applicable [17 CFR 279.1]; any summary of <u>material</u> changes that satisfies the requirements of Part 2 of Form ADV but is not contained in the brochure; and a record of the dates that each brochure, brochure supplement and Form CRS, each amendment or revision thereto, and each summary of <u>material</u> changes not contained in a brochure given to any client or to any prospective client who subsequently becomes a client</p> <p>A copy of each brochure and brochure supplement, and each amendment or revision to the brochure and brochure supplement, that satisfies the requirements of Part 2 of Form ADV [17 CFR 279.1]; any summary of material changes that satisfies the requirements of Part 2 of Form ADV but is not contained in the brochure; and a record of the dates that each brochure and brochure supplement, each amendment or revision thereto, and each summary of material changes not contained in a brochure was given to any client</p>	<p>Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)</p>

<p>or to any prospective client who subsequently becomes a client. See Rule 204-2(a)(14)(i)</p>	
<p>Documentation describing the method used to compute managed assets for purposes of Item 4.E of Part 2A of Form ADV, if the method differs from the method used to compute regulatory assets under management in Item 5.F of Part 1A of Form ADV. See Rule 204-2(a)(14)(ii)</p>	<p>Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)</p>
<p>If not included in the advertisement, a record of the disclosures provided to clients or investors pursuant to § 275.206(4)-1(b)(1)(ii) and (iii) of this chapter; (ii) Documentation substantiating the adviser's reasonable basis for believing that a testimonial or endorsement (as defined in § 275.206(4)-1(e)(17) and (5) of this chapter) complies with § 275.206(4)-1 and that the third-party rating (as defined in § 275.206(4)-1(e)(18) of this chapter) complies with § 275.206(4)-1(c)(1) of this chapter. (iii) A record of the names of all persons who are an investment adviser's partners, officers, directors, or employees, or a person that controls, is controlled by, or is under common control with the investment adviser, or is a partner, officer, director, or employee of such a person pursuant to § 275.206(4)-1(b)(4)(ii) of this chapter. See Rule 204-2(a)(15)(i)-(iii) All written acknowledgments of receipt obtained from clients pursuant to § 275.206(4)-3(a)(2)(iii)(B) and copies of the disclosure documents delivered to clients by solicitors pursuant to § 275.206(4)-3. See Rule 204-2(a)(15)</p>	<p>Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)</p>
<p>All accounts, books, internal working papers, and any other records or documents that are necessary to form the basis for or demonstrate the calculation of any performance or rate of return of any or all managed accounts, portfolios (as defined in §275.206(4)-1(e)(11) of this chapter), or securities recommendations presented in any notice, circular, advertisement (as defined in §275.206(4)-1(e)(1) of this chapter), newspaper article, investment letter, bulletin, or other communication that the investment adviser disseminates, directly or indirectly, to any person (other than persons associated with such investment adviser), including copies of all information provided or offered pursuant to § 275.206(4)-1(d)(6) of this chapter; provided, however, that, with respect to the performance of managed accounts, the retention of all account statements, if they reflect all debits, credits, and other transactions in a client's or investor's account for the period of the statement, and all worksheets necessary to demonstrate the calculation of the performance or rate of return of all managed accounts shall be deemed to satisfy the</p>	<p>Five (5) years, with the first two (2) years in an appropriate office of the investment adviser, from the end of the fiscal year during which the investment adviser last published or otherwise disseminated, directly or indirectly, the notice, circular, advertisement, newspaper article, investment letter, bulletin, or other communication. See Rule 204-2(e)(3)(i)</p>

<p>requirements of this paragraph. See Rule 204-2(a)(16)</p> <p>All accounts, books, internal working papers, and any other records or documents that are necessary to form the basis for or demonstrate the calculation of the performance or rate of return of any or all managed accounts or securities recommendations in any notice, circular, advertisement, newspaper article, investment letter, bulletin or other communication that the investment adviser circulates or distributes, directly or indirectly, to 10 or more persons (other than persons connected with such investment adviser); provided, however, that, with respect to the performance of managed accounts, the retention of all account statements, if they reflect all debits, credits, and other transactions in a client's account for the period of the statement, and all worksheets necessary to demonstrate the calculation of the performance or rate of return of all managed accounts shall be deemed to satisfy the requirements of this paragraph. See Rule 204-2(a)(16)</p>	
<p>A record of who the "intended audience" is pursuant to § 275.206(4)-1(d)(6) and(e)(10)(ii)(B). See Rule 204-2(a)(19)</p>	<p>Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)</p>

<b>Retention of Code of Ethics Records</b>
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Description of Record	Retention Requirement
<p>A copy of the investment adviser's code of ethics adopted and implemented pursuant to § 275.204A-1 that is in effect, or at any time within the past five years was in effect. See Rule 204-2(a)(12)(i)</p>	<p>Five (5) years (currently in effect and within the past five years was in effect), with the first two (2) years in an easily accessible place.</p>
<p>A record of any violation of the code of ethics, and of any action taken as a result of the violation. See Rule 204-2(a)(12)(ii)</p>	<p>Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)</p>
<p>A record of all written acknowledgments as required by § 275.204A-1(a)(5) for each person who is currently, or within the past five years was, a supervised person of the investment adviser. See Rule 204-2(a)(12)(iii)</p>	<p>Five (5) years (for each person who is currently, or within the past five years was, a supervised person), with the first two (2) years in an easily accessible place.</p>

<b>Retention of Personnel Records</b>
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Description of Record	Retention Requirement
<p>A record of each report made by an access person as required by § 275.204A-1(b), including any information provided under paragraph (b)(3)(iii) of that section in lieu of such reports. See Rule 204-2(a)(13)(i)</p>	<p>Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)</p>
<p>A record of the names of persons who are currently, or within the past five years were, access persons of the investment adviser. See Rule 204-2(a)(13)(ii)</p>	<p>Five (5) years (for persons who are currently, or within the past five years were, access persons), with the first two (2) years in an easily accessible place.</p>

A record of any decision, and the reasons supporting the decision, to approve the acquisition of securities by access persons under § 275.204A-1(c), for at least five years after the end of the fiscal year in which the approval is granted. See Rule 204-2(a)(13)(iii)	Five (5) years (for at least five years after the end of the fiscal year in which the approval is granted), with the first two (2) years in an easily accessible place.
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**Retention of Legal & Disciplinary Records**

Description of Record	Retention Requirement
A memorandum describing any legal or disciplinary event listed in Item 9 of Part 2A or Item 3 of Part 2B (Disciplinary Information) and presumed to be material, if the event involved the investment adviser or any of its supervised persons and is not disclosed in the brochure or brochure supplement described in paragraph (a)(14)(i) of this section. The memorandum must explain the investment adviser's determination that the presumption of materiality is overcome, and must discuss the factors described in Item 9 of Part 2A of Form ADV or Item 3 of Part 2B of Form ADV. See Rule 204-2(a)(14)(iii)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

**Retention of Compliance and Supervisory Procedure Records**

Description of Record	Retention Requirement
A copy of the investment adviser's policies and procedures formulated pursuant to § 275.206(4)-7(a) of this chapter that are in effect, or at any time within the past five years were in effect. See Rule 204-2(a)(17)(i)	Five (5) years (for policies and procedures that are currently in effect, or at any time within the past five years were in effect), with the first two (2) years in an easily accessible place.
Any records documenting the investment adviser's annual review of those policies and procedures conducted pursuant to § 275.206(4)-7(b) of this chapter. See Rule 204-2(a)(17)(ii)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
A copy of any internal control report obtained or received pursuant to § 275.206(4)-2(a)(6)(ii). See Rule 204-2(a)(17)(iii)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

**Retention of Political Contribution Records**

Description of Record	Retention Requirement
Books and records that pertain to § 275.206(4)-5 containing a list or other record of: (A) The names, titles and business and residence addresses of all covered associates of the investment adviser. See Rule 204-2(a)(18)(i)(A)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
Books and records that pertain to § 275.206(4)-5 containing a list or other record of: (B) All government entities to which the investment adviser provides or has provided investment advisory services, or which are or were investors in any covered investment pool to which the investment adviser provides or has provided	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

investment advisory services, as applicable, in the past five years, but not prior to September 13, 2010. See Rule 204-2(a)(18)(i)(B)	
Books and records that pertain to § 275.206(4)-5 containing a list or other record of: (C) All direct or indirect contributions made by the investment adviser or any of its covered associates to an official of a government entity, or direct or indirect payments to a political party of a State or political subdivision thereof, or to a political action committee. See Rule 204-2(a)(18)(i)(C)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
Books and records that pertain to § 275.206(4)-5 containing a list or other record of: (D) The name and business address of each regulated person to whom the investment adviser provides or agrees to provide, directly or indirectly, payment to solicit a government entity for investment advisory services on its behalf, in accordance with § 275.206(4)-5(a)(2). See Rule 204-2(a)(18)(i)(D)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
Records relating to the contributions and payments referred to in paragraph (a)(18)(i)(C) of this section must be listed in chronological order and indicate: (A) The name and title of each contributor; (B) The name and title (including any city/county/State or other political subdivision) of each recipient of a contribution or payment; (C) The amount and date of each contribution or payment; and (D) Whether any such contribution was the subject of the exception for certain returned contributions pursuant to § 275.206(4)-5(b)(2). See Rule 204-2(a)(18)(ii)(A)-(D)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

<b>Retention of Custody Records</b>
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*If an investment adviser subject to paragraph (a) of this section has custody or possession of securities or funds of any client, the records required to be made and kept under paragraph (a) of this section shall include the following:*

Description of Record	Retention Requirement
A journal or other record showing all purchases, sales, receipts, and deliveries of securities (including certificate numbers) for such accounts and all other debits and credits to such accounts. See Rule 204-2(b)(1)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
A separate ledger account for each such client showing all purchases, sales, receipts and deliveries of securities, the date and price of each purchase and sale, and all debits and credits. See Rule 204-2(b)(2)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
Copies of confirmations of all transactions effected by or for the account of any such client. See Rule 204-2(b)(3)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
A record for each security in which any such client has a position, which record shall show the name of each such client having any interest in such	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

security, the amount or interest of each such client, and the location of each such security. See Rule 204-2(b)(4)	
A memorandum describing the basis upon which you have determined that the presumption that any related person is not operationally independent under § 275.206(4)-2(d)(5) has been overcome. See Rule 204-2(b)(5)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)

<b>Retention of Proxy Voting Records</b>
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*Every investment adviser subject to paragraph (a) of this section that exercises voting authority with respect to client securities shall, with respect to those clients, make and retain the following:*

Description of Record	Retention Requirement
Copies of all policies and procedures required by § 275.206(4)-6. See Rule 204-2(c)(2)(i)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
A copy of each proxy statement that the investment adviser receives regarding client securities. An investment adviser may satisfy this requirement by relying on a third party to make and retain, on the investment adviser's behalf, a copy of a proxy statement (provided that the adviser has obtained an undertaking from the third party to provide a copy of the proxy statement promptly upon request) or may rely on obtaining a copy of a proxy statement from the Commission's Electronic Data Gathering, Analysis, and Retrieval (EDGAR) system. See Rule 204-2(c)(2)(ii)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
A record of each vote cast by the investment adviser on behalf of a client. An investment adviser may satisfy this requirement by relying on a third party to make and retain, on the investment adviser's behalf, a record of the vote cast (provided that the adviser has obtained an undertaking from the third party to provide a copy of the record promptly upon request). See Rule 204-2(c)(2)(iii)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
A copy of any document created by the adviser that was material to making a decision how to vote proxies on behalf of a client or that memorializes the basis for that decision. See Rule 204-2(c)(2)(iv)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)
A copy of each written client request for information on how the adviser voted proxies on behalf of the client, and a copy of any written response by the investment adviser to any (written or oral) client request for information on how the adviser voted proxies on behalf of the requesting client. See Rule 204-2(c)(2)(v)	Five (5) years, with the first two (2) years in an easily accessible place. See Rule 204-2(e)(1)