

QUALIFIED ELIGIBLE PERSON REPRESENTATION QUESTIONNAIRE

For Clients of Luke Asset Management Partners LLC (LAMP)

To be considered a Qualified Eligible Person you must satisfy at least one requirement in either Section A, Qualified Eligible Person by Portfolio Requirement, or in Section B, Qualified Eligible Person by reason of Exemption from Portfolio Requirement. Certain parties must meet the Portfolio Requirement to qualify as a qualified eligible person. Please read the following Sections and check the box that applies to your Qualified Eligible Person status.

The Portfolio Requirement means that a person:

- a) Owns securities (including pool participations) of issuers not affiliated with such person and other investments with an aggregate market value of at least \$2,000,000;
- b) Has had on deposit with a futures commission merchant, for its own account at any time during the six-month period preceding either the date of sale to that person of a pool participation in the exempt pool or the date that the person opens an exempt account with the commodity trading Adviser, at least \$200,000 in exchange-specified initial margin and option premiums for commodity interest transactions; or
- c) Owns a portfolio comprised of a combination of the funds or property specified in paragraphs (a) and (b) in which the sum of the funds or property includable under paragraph (a), expressed as a percentage of the minimum amount required there under, and the amount of futures margin and option premiums includable under paragraph (b), expressed as a percentage of the minimum amount required there under, equals at least one hundred percent (100%). An example of a composite portfolio acceptable under this paragraph (c) would consist of \$1,000,000 in securities and other property [50% of paragraph (a)] and \$100,000 in exchange-specified initial margin and option premiums [50% of paragraph (b)].

SECTION A: QUALIFIED ELIGIBLE PERSON BY PORTFOLIO REQUIREMENT (Please check off all that apply)

I am a person who must satisfy the Portfolio Requirement to be a qualified eligible person and have met such a requirement for the reason provided below (Qualified eligible person means any person or entity who the commodity trading advisor reasonably believes, at the time of the investment is):

- a) An investment company registered under the Investment Company Act or a business development company as defined in section 2(a)(48) of such Act not formed for the specific purpose of either investing in the exempt pool or opening an exempt account:
- b) A bank as defined in section 3(a)(2) of the Securities Act of 1933 (the "Securities Act") or any savings and loan association or other institution as defined in section 3(a)(5)(A) of the Securities Act acting for its own account or for the account of a qualified eligible person:
- c) An insurance company as defined in section 2(13) of the Securities Act acting for its own account or for the account of a qualified eligible person:
- d) A plan established and maintained by a state, its political subdivisions, or any agency or instrumentality of a state or its political subdivisions, for the benefit of its employees, if such plan has total

assets in excess of \$5,000,000:

e) An employee benefit plan within the meaning of the Employee Retirement Income Security Act of 1974; provided, that the investment decision is made by a plan fiduciary, as defined in section 3(21) of such Act, which is a bank, savings and loan association, insurance company, or registered investment adviser; or that the employee benefit plan has total assets in excess of \$5,000,000; or, if the plan is self-directed, that investment decisions are made solely by persons that are qualified eligible persons:

f) A private business development company as defined in section 202(a)(22) of the Investment Advisers Act:

g) An organization described in section 501(c)(3) of the Internal Revenue Code (“IRC”), with total assets in excess of \$5,000,000:

h) A corporation, Massachusetts or similar business trust, or partnership, other than a pool, which has total assets in excess of \$5,000,000, and is not formed for the specific purpose of either participating in the exempt pool or opening an exempt account:

i) A natural person whose individual net worth, or joint net worth with that person's spouse (excluding personal residences), at the time of either his purchase in the exempt pool or his opening of an exempt account exceeds \$1,000,000:

j) A natural person who had an individual income in excess of \$200,000 in each of the two most recent years or joint income with that person's spouse in excess of \$300,000 in each of those years and has a reasonable expectation of reaching the same income level in the current year:

k) A pool, trust, insurance company separate account or bank collective trust, with total assets in excess of \$5,000,000, not formed for the specific purpose of either participating in the exempt pool or opening an exempt account, and whose participation in the exempt pool or investment in the exempt account is directed by a qualified eligible person: ; or

l) Except as provided for the governmental entities referenced in paragraph (a)(3)(iv) of Commodity Exchange Act (“CEA”) Regulation 4.7, if otherwise authorized by law to engage in such transactions, a governmental entity (including the United States, a state, or a foreign government) or political subdivision thereof, or a multinational or supranational entity or an instrumentality, agency, or department of any of the foregoing: .

SECTION B: QUALIFIED ELIGIBLE PERSON BY REASON OF EXEMPTION FROM PORTFOLIO REQUIREMENT (check all that apply)

I am a person who does NOT need to satisfy the Portfolio Requirement to be a qualified eligible person because:

a) I am a futures commission merchant registered pursuant to section 4d of the CEA, or a principal

thereof:

b) I am a FCM or dealer registered pursuant to section 15 of the Securities Exchange Act of 1934, or a principal thereof:

c) I am a commodity pool operator registered pursuant to section 4m of the CEA, or a principal thereof; provided, that the pool operator: (A) Has been registered and active as such for two years; or (B) Operates pools which, in the aggregate, have total assets in excess of \$5,000,000:

d) I am a commodity trading advisor registered pursuant to section 4m of the CEA, or a principal thereof; and: (A) Have been registered and active as such for two years; or (B) Provide commodity interest trading advice to commodity accounts which, in the aggregate, have total assets in excess of \$5,000,000 deposited at one or more futures commission merchants:

e) I am an investment adviser registered pursuant to section 203 of the Investment Advisers Act of 1940 (“Investment Advisers Act”) or pursuant to the laws of any state, or a principal thereof; and: (A) Have been registered and active as such for two years; or (B) Provide securities investment advice to securities accounts which, in the aggregate, have total assets in excess of \$5,000,000 deposited at one or more registered securities FCMs:

f) I am a “qualified purchaser” as defined in section 2(51) (A) of the Investment Company Act of 1940 (the “Investment Company Act”):

g) I am a “knowledgeable employee” as defined in Sec. 270.3c-5 of the CEA Regulations:

h) I am, with respect to the “exempt account” (i.e., the account investing in Walter Fair Managed Account Program) one of the following:

(1) The commodity pool operator, commodity trading advisor or investment adviser of the exempt account, or an affiliate of any of the foregoing:

(2) A principal of the exempt pool or the commodity pool operator, commodity trading advisor or investment adviser of the exempt account, or of an affiliate of any of the foregoing:

(3) An employee of the commodity pool operator, commodity trading advisor or investment adviser of the exempt account, or of an affiliate of any of the foregoing (other than an employee performing solely clerical, secretarial or administrative functions with regard to such person or its investments) who, in connection with his or her regular functions or duties, participates in the investment activities of the exempt account, other commodity pools operated by the pool operator of the exempt account or other accounts advised by the trading advisor or the investment adviser of the exempt account, or by the affiliate; provided, that I have been performing such functions and duties for or on behalf of the exempt account, pool operator, trading advisor, investment adviser or affiliate, or substantially similar functions or duties for or on behalf of another person engaged in providing commodity interest, securities or other financial services, for at least 12 months:

(4) Any other employee of, or an agent engaged to perform legal, accounting, auditing or other financial services for, the exempt account or the commodity pool operator, commodity trading advisor or investment adviser of the exempt account, or any other employee of, or agent so engaged by, an affiliate of any of the foregoing (other than an employee or agent performing solely clerical, secretarial or administrative functions with regard to such person or its investments); and I am: (i) An accredited investor as defined in Sec. 230.501(a)(5) or (6) of the Security Act; and (ii) Have been employed or engaged by the exempt account, commodity pool operator, commodity trading advisor, investment adviser or affiliate, or by another person engaged in providing commodity interest, securities or other financial services, for at least 24 months:

(5) The spouse, child, sibling or parent of a person who satisfies the criteria of paragraph (a)(2)(viii)(A)(1), (2), (3) or (4) of CEA Regulation 4.7; and: (i) the investment in the exempt account is being made at my direction; and (ii) I am not a qualified eligible person for the purposes of paragraph (a)(3)(xi) of said regulation:

(6) (i) A person who has acquired a participation in the exempt account by gift, bequest or pursuant to an agreement relating to a legal separation or divorce from a person listed in paragraph (a)(2)(viii)(A)(1), (2), (3), (4) or (5) of CEA Regulation 4.7; (ii) The estate of any person listed in paragraph (a)(2)(viii)(A)(1), (2), (3), (4) or (5) of said regulation; or (iii) A company established by any person listed in paragraph (a)(2)(viii)(A)(1), (2), (3), (4) or (5) of said regulation exclusively for the benefit of (or owned exclusively by) that person and any person listed in paragraph (a)(2)(viii)(A)(6)(i) or (ii) of said regulation:

i) A trust; and: (A) The trust was not formed for the specific purpose of either participating in the exempt account; and (B) The trustee or other person authorized to make investment decisions with respect to the trust, and each settlor or other person who has contributed assets to the trust, is a qualified eligible person:

j) An organization described in section 501(c)(3) of the IRC; and the trustee or other person authorized to make investment decisions with respect to the organization, and the person who has established the organization, is a qualified eligible person:

k) A Non-United States person:

l) (A) An entity in which all of the unit owners or participants, other than the commodity trading advisor claiming relief under this section, are qualified eligible persons:

(B) An exempt pool: ; or

(C) Notwithstanding paragraph (a)(3) of CEA Regulation 4.7, an entity as to which a notice of eligibility has been filed pursuant to Sec. 4.5 of the CEA which is operated in accordance with such rule and in which all unit owners or participants, other than the commodity trading advisor claiming relief under this section, are qualified eligible persons: .

I hereby represent from the questionnaire above that I fit the definition of a Qualified Eligible Person (QEP).

Client Name(s):

Client Signature(s):

Date: _____