

ITEM ONE COVER PAGE

LORINTINE CAPITAL, LP

Form ADV Part 2 Brochure

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This brochure provides information about the qualifications and business practices of Lorintine Capital, LP. If you have any questions about the contents of this brochure, please contact us at 214-800-5164. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Lorintine Capital, LP is 151204. The Firm's website can be found at: <http://www.lorintine.com>.

Lorintine Capital, LP is a Registered Investment Adviser. Registration of an investment adviser does not imply any level of skill or trading.

Brochure updated on January 18, 2018.

ITEM TWO MATERIAL CHANGES

Material Changes

This item is used to discuss only specific material changes that are made to the Brochure since its last annual update and provide Clients with a summary of such changes.

There are no material changes to the brochure, other than bringing the form up to compliance standards as required by the rule revisions promulgated in 2017.

Currently our brochure may be requested by contacting Christopher Welsh, our President, at 214-800-5164 or cwelsh@lorintinecapital.com.

Additional information about the Firm is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with the Firm who are registered or are required to be registered, as investment adviser representatives.

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ITEM FOUR ADVISORY BUSINESS

Advisory Business

Lorintine Capital, LP (the “Firm”) is a Texas (and other relevant state agencies) registered investment advisory firm founded in 2011 by Christopher B. Welsh. The Firm currently provides advisory services to Clients in Texas and is based in Texas. In the last quarter of 2013, the Firm added its first satellite office in South Dakota. It later opened an office in Arizona as well. The Firm’s principal owner is Christopher Welsh, with several other minority owners, each owning less than twenty five percent (25%) of the Firm. The Vice President of the Firm, Jesse Blom, was granted an equity ownership at the beginning of 2016 that also exceeds twenty five percent (25%).

The Firm has two primary lines of business. The first line of business is as a traditional investment advisory firm (“Investment Advisory Business”). Through its investment adviser representatives, the Firm provides (i) portfolio and wealth management services, (ii) manages and assists with IRAs, SEP-IRAs, 401Ks, trusts, and other retirement vehicles, (iii) financial planning services, (iv) retirement planning, (v) developing customized investment strategies, (vi) portfolio management, and (vii) other general investment advisory services. Assets under management may be entirely discretionary, entirely non-discretionary, or anything between, depending on each Client’s needs and desires, as well as what is most appropriate for that particular Client. The vast majority of the Firm’s Clients participate in the Firm’s Investment Advisory Business.

The second line of business is serving as the general partner and fund manager for private hedge funds and other pooled investment vehicles (“Fund Business”). The management and investment strategies of any particular hedge fund or pooled investment strategy is unique to that particular fund and is governed by that fund’s particular methodologies and goals. Each fund managed by the Firm issues private placement memorandum (“PPM”) specific to the fund detailing the fund’s strategies, risk tolerance, financial goals, and other business concerns. Assets under management may be discretionary or non-discretionary, entirely depending on the particular fund and the contract between the Firm and that fund.

Does the Firm utilize a wrap fee program?

Rule 204-3(g)(4) defines a wrap fee program to be “a program under which any Client is charged a specified fee or fees not based directly on transactions in a Client’s account for investment advisory services (which may include portfolio management or advice concerning the selection of other advisers) and execution of Client transactions.”

The Firm has been informed by at least one state securities board that by charging an asset’s under management (“AUM”) fee for the provision of investment advice and portfolio management services, the Firm offers a wrap fee. In an effort to fully comply with all disclosure requirements, the Firm has therefore prepared a wrap fee brochure. On the other hand, other state securities agencies have informed the Firm that charging an assets under management fee is not a wrap fee. For these states, this brochure has been prepared.

As discussed in more detail below, regardless of whether or not the Firm's fees are considered "wrap fees" or "non-wrap fees," the Firm's primary method of collecting fees is based off of an asset under management model wherein the Firm charges a straight annual fee based off of total assets under management. For example, if a Client were to have a one hundred thousand dollar account (\$100,000.00) in the Firm's normal one point five percent (1.5%) fee account, that Client could expect an annual fee of approximately one thousand five hundred dollars (\$1,500.00). Different clients are charged different amounts depending on client size.

The Firm currently has approximately thirty-seven million dollars (\$37,000,000.00) under management, of which the Firm maintains discretionary authority over approximately ninety nine percent (99%).

ITEM FIVE FEES AND COMPENSATION

Fees and Compensation

A. Investment Advisory Business

For its Investment Advisory Business, the Firm is paid pursuant to the fee agreement between the Firm and the individual client. The Firm's standard fee structure is one point five percent of total assets under management (1.5%) annually, with fees being deducted from a client's account directly. Fees are deducted from a client's account directly by the custodian/broker on an amortized monthly basis (1/12 of 1.5% per month). The custodian/broker of a Client's funds deducts amounts from the client's account based upon an invoice provided to the custodian/broker by the Firm. Fees are based on the end of month balance in the clients account based on the last trading day of the month. Fees are taken at the end of each month and are not billed in advance.

For specialty products and strategies, the Firm may charge fees of up to two percent (2%) of assets under management. These fees are clearly disclosed in all client fee agreements and require express approval of a client before a client may be charged such fees. This fee is not on top of the earlier one point five percent (1.5%) fee, rather it is a separate fee. Fees are deducted from a client's account directly by the custodian/broker on an amortized monthly basis (1/12 of 2.0% per month). The custodian/broker of a client's funds deducts amounts from the client's account based upon an invoice provided to the custodian/broker by the Firm. Fees are based on the end of month balance in the clients account as of the last trading day of the month. Fees are taken at the end of each month and are not billed in advance.

The Firm also does offer hourly billing service arrangements and alternative fee schedules for clients with accounts of sufficient size. The Firm does not take performance fees in its Investment Advisory Business. On client accounts which request hourly services, depending on the adviser, the client will be charged between three and four hundred dollars per hour (\$300.00 - \$400.00). Fees are not billed in advance and will be collected via monthly invoicing. If a client requests an estimate of hourly costs, the Firm will provide one. Typically, hourly fee structures result in higher fees to Clients and are not recommended.

Reduce fees may be individually negotiated with any client. Such situations are evaluated on a case by case basis, and all such individually negotiated fees will be clearly set forth in the client's investment advisory agreement.

The Firm also offers subscription fees for certain services to certain clients. These fees are an agreed "per month" flat fee for certain products. Such fees vary by client and can range from twenty five dollars (\$25.00) per month up to one hundred dollars (\$100.00) per month.

The Firm currently maintains two offices for its Investment Advisory Business. The Firm's principal office is located at:

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The Firm's satellite office is located at 207 N. Gilbert Rd., Suite 001, Gilbert, AZ 85234.

B. Applicable to All Clients in all Lines of Business

All of our clients will also be responsible for other fees and expenses, particularly as it relates to the purchase or sale of securities. The following list of fees and/or expenses are what a client pays directly to third parties. These fees are charged by the broker/dealer/custodian. The Firm does not receive, directly or indirectly, any of the fees. They are directly paid to the broker, dealer, or custodian. Such fees include, but may not be limited to:

- Brokerage commissions;
- Transaction fees;
- Exchange fees;
- SEC fees;
- Advisory fees and administrative fees charged by mutual funds, exchange trade funds, or other similar instruments;
- Custodial fees;
- Deferred sales charges;
- Odd-lot differentials;
- Transfer taxes;
- Wire transfer and electronic fund processing fees;
- Interest on margin; and
- Other similar cost and expense which may be incurred.

C. Fund Business

For its Fund Business, the Firm is paid fees and compensation pursuant to the terms of a contract between the Firm and the particular fund it manages. The typical fee structure is an annual management fee equal to two percent (2%) of assets under management, taken quarterly, and a

yearly performance fee equal to twenty percent (20%) of gains. One of the Firm's funds, the LC Diversified Fund, is paid an annual management fee equal to one percent (1%) of the assets under management and ten percent (10%) of the Fund's profits. These fees are subject to specific negotiations with each particular fund and actual arrangements may not match the typical fee structure. When performance fees are not able to be earned (e.g. when the client is not a qualified client as that term was amended on February 15, 2012 in Rule 205-3 of the Investment Advisers Act of 1940), other fee structures may be specifically negotiated.

In most cases fees are either deducted directly from client accounts or transferred to the Firm in the form of equity in a particular fund (carried interest). Management fees are deducted on a quarterly basis and performance fees, if any, are taken quarterly or annually, according to the agreement with each fund. While this is the typical fee arrangement, any client or potential client's, fee structure may be independently negotiated and differ substantially.

D. Financial Planning Services

The Firm's advisors who have obtained the CERTIFIED FINANCIAL PLANNER™ designation may also provide general financial planning services to the Firm's clients. Such services are in addition to any fees generating from asset based managed services. Financial Planning may be done for asset managed clients or clients who do not have assets at the firm. All such financial planning services are done pursuant to a separate written agreement that sets forth the rates charged. Such fees are typically hourly or flat rate. Discounts for financial planning may be given to clients who also have assets invested with the Firm.

E. Conflicts of Interest

None of our advisors are compensated for the sale of any one particular product. None of the Firm's advisors are permitted to earn commissions for recommending one investment over another. We believe this reduces the potential conflicts of interest existing in most firms. *However*, not all of the Firm's products are priced the same. As such it could be an apparent conflict of interest to recommend a client invest in one firm product over the other. The Firm has strict policies in place to avoid such practices, but the appearance of conflict does exist. All rates of all products presented will clearly be disclosed to clients.

ITEM SIX PERFORMANCE BASED FEES AND SIDE BY SIDE MANAGEMENT

Performance Based Fees and Side-by-Side Management

The Firm may earn performance based fees from a fund client under the terms of the specific management contract between the Firm and a particular client. Any such client charged a performance fee must be a "qualified client" as that term is defined by the Rule 205-3 of the Investment Advisers Act of 1940, as amended.

As any fund client trades only a defined strategy, the Firm does not believe a conflict of interest exists. However, securities laws require that the Firm disclose that an adviser may have

an incentive to favor accounts which have performance based fees over other client accounts. The Firm believes the fact that these accounts trade only specific, very defined strategies, alleviates any perceived conflict. Any Firm adviser who is found to have neglected client accounts will initially be subject to discipline and, if such problems persist, terminated. The Firm does not tolerate the neglect of any client account and all client accounts are regularly reviewed, as discussed herein.

ITEM SEVEN TYPES OF CLIENTS

Types of Clients

In its Fund Business, the Firm primarily provides services to hedge funds and private investment pools.

In its Investment Advisory Business, the Firm provides services to any client, whether such client is an individual, business, pooled investment vehicle, trust, or other entity, provided the client meets the Firm's minimum account size. The Firm will provide services to any party, regardless of account size, on an hourly fee basis.

ITEM EIGHT METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS

Methods of Analysis, Investment Strategies, and Risk of Loss

A. The Investment Advisory Business

Through the Firm's investment advisers, customized advice is provided to each client based upon that client's particular investment goals, risk tolerances, financial situation and capabilities, and which is uniquely appropriate for that particular client. The Firm's investment advisers take an active role in assisting with financial planning, developing particular strategies, and creating investment plans which meets each client's needs.

Some strategies which are traded in clients' accounts are the same or similar to those discussed on the website <http://www.steadyoptions.com>. The Firm has defined practices in place to avoid conflicts with the website. Any trade which is listed on the website is listed only after having already been placed and cleared in client accounts. The Firm has strict policies against front running. Further, Christopher Welsh has created an entity, Option Income, LLC, with two of his friends, which will trade the Steady Options strategy for purposes of tracking the strategies returns. Option Income, LLC is not an investment fund and is not open to clients.

While the Firm's investment advisers will always take each client's risk tolerances into consideration, all investments in equities, bonds, options, businesses, or almost any investment vehicle whatsoever includes the risk of loss of principal (investment amount) and any profits that have not been realized. The Firm's investment advisers actively work with clients to minimize losses and risk of a client's assets, however neither the Firm, nor the investment advisers associated with the Firm, can guarantee any level of performance or that a client will not experience a loss of

assets. Investing in securities of any form involves a risk of loss that clients should be prepared to bear.

B. The Fund Business

As a private fund manager, the Firm is devoted to implementing the strategies unique to each fund under management. The Firm takes an active role in developing each fund's investment strategies, risk management techniques, financial models, and putting together investment documents for potential investors in a particular fund, including, but not limited to PPM's, subscription agreements, and summaries.

The Firm fully anticipates the methods of analysis, strategies, and risk of loss to be highly variable depending on a particular funds goals and methodologies. Of course all investment in any hedge fund includes the risk of loss of principal (invested amount) and any profits that have not been realized. The Firm works diligently to minimize the risk of loss and does its best in the management of client assets; however, it cannot, and does not, guarantee any level of performance or that a client will not experience a loss of assets. Investing in securities of any form involves a risk of loss that clients should be prepared to bear.

ITEM NINE DISCIPLINARY INFORMATION

Disciplinary Information

The Firm is required to disclose any disciplinary event that would be material to a client when evaluating the Firm to initiate a client/adviser relationship or to continue a client/adviser relationship with the Firm.

Neither the Firm, nor any of its affiliated investment advisers, have any material legal, financial, or other disciplinary item(s) to report.

ITEM TEN OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Other Financial Industry Activities and Affiliations

Neither the Firm nor any of its affiliated investment advisers or supervised persons are affiliated with any other investment adviser or broker/dealer. Neither the Firm nor any of its affiliated investment advisers or supervised persons have any relationships or arrangements with other firms in the financial industry that are material to the Firm's business.

The Firm's principals, Christopher Welsh and Jesse Blom, have earned the CERTIFIED FINANCIAL PLANNER™ designation. The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the "CFP® marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

The Firm’s clients should be aware that one of the Firm’s principals, Christopher Welsh, is a licensed and practicing attorney with the Law Offices of Christopher Welsh, PLLC. The Firm

maintains strict guidelines and requirements regarding client files and does not believe that this materially impacts the Firm in any way.

The Firm may recommend one of the funds it manages (the Fund Business) to one of its investment advisory clients. There is an inherent potential conflict of interest when recommending an advisory client to invest in a Firm managed fund. The Firm has strict policies ensuring that any such recommendation will be made only when suitable to a particular client's individual situation and financial capabilities. The Firm will also fully disclose the conflict, the fees earned, and ensure each client understands that it is the client's option to invest in a Firm managed fund. "Pressure" sales techniques by investment advisers affiliated with the Firm, to "steer" a client into a Firm managed Fund, will not be tolerated or permitted. The Firm's policies provide that if an investment adviser finds a client even seems to be uncomfortable with investing in a Firm managed fund, the client will not be allowed to invest in it.

Some of the Firm's advisors may offer insurance products through other entities. Such advisors likely receive compensation for offering such products. No compensation for such products is received by the Firm, but your actual advisor may be being compensated for selling such insurance products. This may present a conflict of interest in making recommendations to you regarding what investments are best for you.

ITEM ELEVEN CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS, AND PERSONAL TRADING

Code of Ethics, Participation in Client Transactions, and Personal Trading

The Firm has a compliance manual which has been distributed to all investment advisers associated with the Firm, as well as any and all employees, independent contractors, or any other entity or individual which may work with the Firm on a client's behalf. The Firm requires that all of these people and/or entities comply with the terms and conditions listed in its compliance manual.

The Firm has adopted a Code of Ethics for all supervised persons and investment advisers of the Firm describing its high standard of business conduct and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of gifts and business entertainment items, and personal securities trading procedures, among other things. All supervising persons must acknowledge the terms of the Code of Ethics annually, or as amended. Any client may review or receive a copy of the Firm's Code of Ethics upon request.

Subject to satisfying this policy and applicable laws, officers, directors, and employees of our Firm and its affiliates may trade for their own account in securities which are recommended to and/or purchased for our clients. The Code of Ethics is designed to assure the personal securities transactions, activities, and interests of our employees will not interfere with (i) making decisions in the best interest of our clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Virtually all trading in personal accounts is done through a particular carried interest in a particular hedge fund client, meaning that employees

and/or the Firm are merely participating in the exact transactions occurring in client accounts, as such transactions occur.

The Firm strictly forbids insider trading and the misuse of “insider” information (material, non-public information).

The Firm requires its advisers and their related persons who have a material financial interest in a security to disclose that interest to clients prior to recommending such security. If an adviser does make such a recommendation, the adviser must disclose the potential conflict in writing, with a copy of the writing to be saved in the client’s file. As of the date of this brochure, no Firm adviser has a material financial interest in any publically traded security.

The Firm’s advisors may participate in the Fund’s the Firm manages.

ITEM TWELVE BROKERAGE PRACTICES

Brokerage Practices

For the Firm’s investment advisory business, the Firm maintains client accounts at either TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC/NFA or Interactive Brokers, depending on each client’s particular needs. The majority of clients will have their accounts established through TD Ameritrade Institutional. Certain clients who heavily utilize margin or who trade high volumes of securities will have their accounts established through Interactive Broker’s Institutional platform. Clients may, at their discretion, request to use either or both platforms. The Firm is not compensated in any way from either custodian and/or broker.

The Firm has no soft dollar arrangements with any outside custodian or brokerage firm. The Firm does not receive research information it utilizes from its brokers and/or custodians. The Firm simply does not accept soft dollar benefits in exchange for execution of trades or routing of trades.

For the Firm’s hedge fund and/or pooled investment clients, the Firm does not generally select the broker/dealer used for custody and trading. Each fund makes that decision internally, based upon its best business interest. The Firm maintains no relationships with any broker/dealer, does not recommend specific broker/dealers, and does not receive any “soft dollars” or other similar arrangements from broker/dealers.

AGGREGATION OF TRADES

The Firm typically *does* aggregate trades for clients. When all clients are ordering the same type of security, on the same day, the order is submitted as a block order and fees and expenses are pro-rated across all client accounts to ensure all clients are treated equally. The firm does not aggregate orders under the following conditions:

- (a) At a client’s request;
- (b) When it is necessary to fill large orders that may not otherwise be fillable; and

(c) When our brokers require it.

Please note it is *not* a common practice to not aggregate trades. Most firms aggregate trades.

ITEM THIRTEEN REVIEW OF ACCOUNTS

Client Accounts/Review of Accounts

A. Investment Advisory Business

Each client of the Firm is important to the Firm and every client account will be reviewed by the investment adviser assigned to a particular client's account at least annually after the client responds to the end of year account update questionnaire that is sent to each client. Of course the Firm encourages its investment advisers to review client accounts more frequently, and all of the Firm's clients are encouraged to call or visit their investment adviser as often as desired. The Firm's goal is to have a personal relationship with each of its clients and have them completely comfortable with the Firm's model, advice, and suggestions.

Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

B. Fund Business

Each individual hedge fund and/or pooled investment vehicle client of the Firm has its own review policy. Such review typically occurs monthly, quarterly, and/or annually. Any investor in a particular fund or pooled investment vehicle must review that particular fund's PPM and offering documents for a full disclosure of the review policies of each fund.

The Firm issues reports to each client, hedge fund, and/or pooled investment vehicle with which it does business pursuant to the terms and conditions of the contract with the client. Reporting may vary client to client. The Firm typically issues such reports quarterly, but such practices may vary between clients.

The Firm will always issue a report of current assets, fees, expenses, and other accounting upon request of any client, up to monthly, should the Client so request.

The Firm's principal has launched an entity, Option Income, LLC, to track one of the Firm's strategies (Steady Options model). Option Income, LLC is not a fund and is not open to outside clients.

ITEM FOURTEEN CLIENT REFERRALS AND OTHER COMPENSATION

Client Referrals and Other Compensation

The Firm does not receive any fees for client referrals from outside entities. The Firm prohibits its advisors from accepting referral fees. Any compensation the Firm receives is specifically outlined in the contract between the Firm and a client.

The Firm does permit its investment advisers to enter into referral/solicitor arrangements with outside parties to attract new clients. Any referral arrangement must (i) be pre-approved by the Firm (ii) the referral arrangement is in full compliance with SEC Rule 206(4)-3 under the Investment Advisers Act of 1940. Such solicitor agreements are required to comply with all SEC rules and may be entered into from time to time.

ITEM FIFTEEN CUSTODY

Custody

The Firm does maintain custody of Client funds for its retail clients, but only as specified and defined under the Grossman opinion letter dated February 21, 2017. The firm specifically claims the safe harbor provision as set forth in that letter. All retail client funds will be deposited directly with the brokerage firm with which the Firm does business. The Firm *does* have the authority to directly deduct fees from some of its Client's accounts, but only pursuant to a signed agreement in compliance with the letter opinion. All such agreements must be in writing, and all such fees are disclosed to Client's on their monthly statements.

Clients should receive at least quarterly, if not monthly, statements from the broker dealer or other qualified custodian that holds and maintains investment assets. The Firm urges all clients to carefully review such statements and compare such official custodial records to the account statements provided by the Firm. The Firm's statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If any client has any question about any discrepancies, they should contact the Firm as soon as possible to address the issue.

The Firm does maintain custody of its Fund clients' funds. Such funds are always kept in the accounts of a third party bank or brokerage institution. Fund client accounts are also subject to an annual audit by an independent third party auditor.

ITEM SIXTEEN INVESTMENT DISCRETION

Investment Discretion

A. Investment Advisory Business

Discretionary investment decisions vary completely from client to client, depending on each client's desires, as well as what may be suitable for each client, pursuant to the terms of the contract between the Firm and the individual client. Some clients may wish the Firm to retain full discretionary control over their accounts, subject to the Firm's investment policies, limitations, risk management, and restrictions provided by a client. Other clients may wish the Firm to have no discretionary authority whatsoever. The Firm will honor each client's wishes with respect to discretionary trading and will have a thorough discussion with each client regarding the impact of discretionary trading as compared to non-discretionary trading.

The Firm's clients will specifically authorize discretionary authority, or not, in the client's agreement with the Firm. A client must also, in its brokerage/custodian agreement, also inform the broker/custodian whether or not the Firm has discretionary authority, in writing. Prior to providing such authorization, while reviewing the client agreement with the client, the Firm's advisers will discuss discretionary authority with each client.

B. Fund Business

Investment decisions with regards to all hedge fund and/or pooled investment vehicle clients are dictated by the specific fund, its methods, and business practices. The Firm will abide by the terms of the contract with any hedge fund, which may vary from client to client.

Typically the Firm has complete discretion over hedge fund client accounts, provided that such discretion is solely done toward a furtherance of the hedge fund's investment goals, financial models, methodologies, and business strategies and pursuant to the signed agreements between the Firm and the fund client. When selecting securities for a client, the Firm implements the investment policies, limitations, and restrictions provided to it by the Client.

ITEM SEVENTEEN VOTING CLIENT SECURITIES

Voting Client Securities

As a matter of Firm policy and practice, the Firm does not have authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

The only exception to this is in the Firm's Fund business where the Firm may, in its role of general partner of a hedge fund and/or pooled investment client, vote proxies on behalf of the limited partners of such funds. However, such voting is done in its role as a general partner, not in its role as an independent investment adviser.

ITEM EIGHTEEN FINANCIAL INFORMATION

Financial Information

Registered investment advisers are required in this item to provide you with certain information or disclosures about our financial condition. The Firm is well capitalized, has no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Business Continuity Plan

The Firm has developed a business continuity plan to address how the Firm will respond to events that may disrupt its business. Since the timing and impact of disasters is unpredictable, the Firm will have to be flexible in responding to events as they occur.

The plan is designed to permit the Firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. Such plan covers data backup and recovery, mission critical systems, alternative communications, bank and counterparty impact, regulatory reporting, and the assurance of access to funds and securities for the Firm's customers. In the worst case scenario, the plan provides for a liquidation of assets and return of all funds and/or securities back to clients.

Privacy Notice to Customers

The Firm does not disclose nonpublic personal information about its clients or former clients except as permitted or required by law. The Firm restricts access to nonpublic personal information about its clients to those employees who need to know the information to provide products or services to you. Such information is protected physically and electronically.

Please note that the Firm is subject to audits by Federal and State regulators who, by law, will have access to client's nonpublic personal information, including name, social security number (if any), and amount and type of investments. By law, Federal and State regulators are required to keep such information confidential, but the Firm cannot, and will not, make any representation or warranty about what any regulatory agency may or may not do with a client's personal information once in the possession of any Federal or State agency.

The Firm also maintains a separate privacy policy which it distributes to all of its clients.

ITEM NINETEEN REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Requirements for State-Registered Advisers

A. Executive Officers / Management Persons

Christopher Welsh

Christopher B. Welsh is the managing member and founder of Lorintine Capital, LP, an investment management company.

Christopher Welsh obtained a Doctorate of Jurisprudence in 2006 from Southern Methodist University, and degrees in Computer Science (B.S.) and Economics (B.S.) from Texas A&M in 2003. He currently is a partner at the Law Offices of Christopher Welsh, PLLC and a licensed investment adviser.

Jesse Blom

Jesse Blom is an investment adviser representative of Lorintine Capital, LP and the manager of the Firm's Arizona office. Jesse has extensive industry experience as an investment and financial adviser since 2008. He brings a high level of passion and knowledge for the financial and options markets designed to empower his clients and to provide support and additional expertise to the Firm.

Jesse began his financial career with New York Life in 2008 after graduating with honors from Oral Roberts University with a degree in finance. At New York Life he completed extensive company and American College training on multiple aspects of comprehensive financial planning such as insurance and estate planning, and investment advice.

B. Firm's other businesses

The Firm is not engaged in any other business other than in its role as a registered investment adviser. The Firm is promoted by its advisers through other businesses, in particularly through the options publication to be found at <http://www.steadyoptions.com>.

The Firm's advisers engage in other business activities as disclosed in the brochure settlements below in Item 4.

C. Performance Based Fees

The Firm currently is not charging any performance fees to any client other than its private fund clients. The Firm never charges performance base fees to its Investment Advisory Clients.

D. Involvement in Adverse Events

Neither the Firm nor any of its advisers have been involved in any of the adverse events listed in the instructions to Form ADV Part II. Specifically the Firm and its advisers have (i) not been found liable in any arbitration alleging damages in excess of \$2,500.00, or (ii) had an award issued by a civil, self-regulatory organization, or administrative proceeding in any material form.

E. Relationships with Issuers of Securities

The Firm currently has no relationship with any issuer of securities.

ADV Part 2 – Brochure Supplements

A. Christopher Welsh

Item 1 – Cover Page for Christopher B. Welsh

Lorintine Capital, LP
4925 Greenville Ave., Suite 200
Dallas, TX 75206
P: (214) 800-5164
F: (214) 800-5165

Current as of January 18, 2018
Birth Year: 1979
Individual CRD# 5725264

This brochure provides information about Christopher B. Welsh that supplements the Lorintine Capital, LP brochure. You should have received a copy of that brochure. Please contact Christopher Welsh at (214) 800-5164 if you did not or if you have any questions about the content of this supplement.

Additional information about Christopher B. Welsh is available on the SEC’s website at www.adviserinfo.sec.gov as well as on the Firm’s website at www.lorintinecapital.com.

Item 2 – Educational Background and Investment Experience

Christopher B. Welsh is the managing member and founder of Lorintine Capital, LP, an investment management company.

Christopher Welsh obtained a Doctorate of Jurisprudence in 2006 from Southern Methodist University, and degrees in Computer Science (B.S.) and Economics (B.S.) from Texas A&M in 2003. He currently is a partner at the Law Offices of Christopher Welsh, PLLC and a licensed investment adviser.

Item 3 – Disciplinary Information

There is no material disciplinary information to report.

Item 4 – Other Business Activities

Mr. Welsh is also a practicing attorney, licensed by the State Bar of Texas, and the owner of the Law Offices of Christopher Welsh, PLLC. In some limited aspects, Clients of the Firm may also do business with Mr. Welsh’s law firm. All conflicts are disclosed and agreed to in writing.

There are no referral arrangements, fee splitting agreements, or “soft money” arrangements between the Firm the Law Offices of Christopher Welsh, PLLC.

Mr. Welsh also regularly contributes as an author to the website <http://www.steadyoptions.com> (the “Steady Options Website”). The Steady Options Website mentions the Firm and has been a source of clients for the Firm. The Firm does not maintain the Steady Options Website, own the Steady Options Website, or direct the Steady Option Website’s activities.

Mr. Welsh also owns interests in various outside business entities. All of these investments are passive investments over which Mr. Welsh exerts no control. Mr. Welsh does not own over a five percent (5%) stake in any outside business entity other than those disclosed above.

Item 5 – Additional Compensation

Mr. Welsh is paid for his work at the Firm. He is the majority owner of the Firm and also receives end of the year profit distributions, if any. He also receives compensation from his work as an attorney at his law firm, as well as for his contributions to various financial publications. His work at the Law Offices of Christopher Welsh, PLLC is unrelated to Lorintine Capital. The Law Offices of Christopher Welsh, PLLC is an independent company with no relation to Lorintine Capital.

Mr. Welsh may also receive compensation from the Steady Options Website.

Item 6 – Supervision

Mr. Welsh is the President and CEO of the Firm. As the chief executive of the Firm, there is no one above him in the organizational chart to directly supervise his advisory activities. Mr. Welsh maintains an “open records” policy for any and all Clients. Any fund Client, upon notice and during reasonable business hours, may inspect the books, records, and accounts of the fund in which the Client participates at any time, subject to a standard non-disclosure agreement. Certain private information of other Clients will be redacted during such audit. Any Client may request access to information regarding their account at any time during regular business hours, without restriction.

Item 7 – Requirements for State Registered Advisers

The Adviser has not been found liable in any arbitration claims of any amount. The Adviser has not been found liable in a civil, self-regulatory organization, or administrative process of any material form. The Adviser has not been the subject of a bankruptcy petition.

B. Jesse Blom

Item 1 – Cover Page for Jesse Blom

Lorintine Capital, LP
207 N. Gilbert Road, Suite 001
Gilbert, AZ 85234

Current as of January 18, 2018
Birth Year: 1986
Individual CRD#: 5483507

This brochure provides information about Jesse Blom that supplements the Lorintine Capital, LP brochure. You should have received a copy of that brochure if he is your representative. Please contact Jesse Blom at 605-680-2972 if you did not or if you have any questions about the content of this supplement.

Additional information about Jesse Blom is available on the SEC's website at www.adviserinfo.sec.gov as well as on the Firm's website at www.lorintinecapital.com.

Item 2 – Educational Background and Investment Experience

Jesse Blom is an investment adviser representative of Lorintine Capital, LP. Jesse has extensive industry experience as an investment and financial adviser since 2008. He brings a high level of passion and knowledge for the financial and options markets designed to empower his clients and to provide support and additional expertise to the Firm.

Jesse began his financial career with New York Life in 2008 after graduating with honors from Oral Roberts University with a degree in finance. At New York Life he completed extensive company and American College training on multiple aspects of comprehensive financial planning such as insurance and estate planning, and investment advice. Mr. Blom's specific positions while at New York Life were:

August 08, 2008 – November 1, 2013 New York Life Insurance Agent and NY Life Securities Registered Representative

July 26, 2010 – November 1, 2013 – Investment Advisory Representative of Eagle Strategies, the Registered Investment Advisor subsidiary with New York Life

Item 3 – Disciplinary Information

There is no material disciplinary information to report.

Item 4 – Other Business Activities

Jesse acts as a licensed independent life, disability, and long-term care insurance agent providing protection planning needs to individuals and businesses. In some aspects Jesse may provide insurance product solutions to Clients of the Firm.

Mr. Blom also regularly contributes as an author to the website <http://www.steadyoptions.com> (the “Steady Options Website”). The Steady Options Website mentions the Firm and has been a source of clients for the Firm. The Firm does not maintain the Steady Options Website, own the Steady Options Website, or direct the Steady Option Website’s activities.

Item 5 – Additional Compensation

Jesse is compensated from the individual insurance companies for providing insurance product solutions, when applicable. Jesse also receives compensation for his contribution to steady options. Such compensation is not related to his work at Lorintine Capital and is done in his individual capacity. Mr. Blom may also receive compensation from the Steady Options Website.

Item 6 – Supervision

Mr. Blom is an investment adviser representative associated with the Firm and the director of the Firm’s Arizona office. As an investment adviser, his activities will be monitored and supervised by Mr. Welsh. Mr. Blom has the authority to oversee other investment advisers located and contracted with through the Arizona office. Mr. Blom maintains an “open records” policy for any and all Clients. Any fund Client, upon notice and during reasonable business hours, may inspect the books, records, and accounts of the fund in which the Client participates at any time, subject to a standard non-disclosure agreement. Certain private information of other Clients will be redacted during such audit. Any Client may request access to information regarding their account at any time during regular business hours, without restriction.

Item 7 – Requirements for State Registered Advisers

The Adviser has not been found liable in any arbitration claims of any amount. The Adviser has not been found liable in a civil, self-regulatory organization, or administrative process in any material form. The Adviser has not been the subject of a bankruptcy petition.