

**FINANCIAL DISCLOSURE FORM
COVER PAGE**

The Financial Disclosure Form ("Form") must be accurately completed and submitted by each Disclosing Entity. The requirement of disclosure of financial interests is a continuing obligation. If circumstances change and the disclosure is no longer accurate, Disclosing Entities must provide an updated form within thirty (30) business days of the change. The Form must also be updated annually by July 1. Upon review of the Form, CMS and IOC may request additional information to clarify and/or complete the submission.

Separate forms are required for the QP and Sub-Participant; additional disclosures may be required for parent entities, upon request of CMS or IOC.

This disclosure is submitted for (check one):

- Qualified Purchaser
 Sub Participant

Qualified Purchaser Name: Vendor Assistance Program, LLC

Doing Business As (DBA): N/A

Disclosing Entity Name: IRT Funding Trust

Dates and Jurisdiction of business formation or incorporation, if applicable: 6/21/2017 Delaware Trust

Instrument of Ownership or Beneficial Interest (check one):

- Sole Proprietorship
 Corporate Stock (C-Corporation, S-Corporation, Professional Corporation, Service Corporation)
 Limited Liability Company Membership Agreement (Series LLC, Low-Profit Limited Liability Partnership)
 Partnership Agreement (General Partnership, Limited Partnership, Limited Liability Partnership, Limited Liability Limited Partnership)

Trust Agreement (Beneficiary) associated with Qualified Purchaser: IRT Funding Trust

- Other
If you selected Other, please describe: _____

STEP 1
SUPPORTING DOCUMENTATION SUBMITTAL

- All Disclosing Entities must provide a current organizational chart showing its ownership structure and composition.

Disclosing Entities must select one of the options below and select the documentation you are submitting. You must provide the documentation the applicable section requires with this form.

- Option 1 – Publicly Traded Entities
1.A. Complete Step 2, Option A for each qualifying individual or entity holding any direct or indirect financial interest in the Disclosing Entity.
OR
1.B. Provide a copy of the federal 10-K (attached or electronically) and skip to Step 3.
- Option 2 – Privately Held Entities with more than 200 Shareholders
2.A. Complete Step 2, Tables 1 and 2 for each qualifying individual or entity holding any direct or indirect financial interest in the Disclosing Entity.
OR
2.B. Complete Step 2, Tables 1 and 2 for each qualifying individual or entity holding any direct or indirect financial interest in the Disclosing Entity and attach the information federal 10-K reporting companies are required to report under 17 CFR 229.401.
- Option 3 – All other Privately Held Entities
3.A. Complete Step 2, Tables 1 and 2 (and Table 3 if a TRUST) for each qualifying individual or entity holding any direct or indirect financial interest in the Disclosing Entity.

STEP 2
DISCLOSURE OF FINANCIAL INTEREST OR BOARD OF DIRECTORS

Complete for all entities. Additional rows may be inserted into the tables or an attachment if needed.

Ownership Share and Distributive Income – Provide the name and address of each person, director, owner, officer, association, financial backer, partnership, other entity, corporation or trust with an indirect or direct financial interest in each qualified purchaser, or entity. If you are completing this form as a **TRUST** and checked **3.A.**, you **must** also complete **TABLE 3**. Earnings should reflect gross revenues by QP or Sub-participant or indirect earnings of a parent entity originally derived through the VPP. All owners, down to the individual, should be provided.

- Check here if including an attachment with requested information in a format substantially similar to the format below.

Name (first, middle, last, maiden, aliases)	Mailing Address	Percentage of Ownership/Interest	Type of Ownership	Class of Stock	Gross Revenues

Distributive Income – If you selected Option 1.A., 2.A, 2.B. or 3.A. in Step 1, provide the name and address of each individual or entity and their percentage of the Disclosing Entity's total distributive income. Distributive income refers to income derived by virtue of ownership in an entity (e.g. QP, Sub-participant).

- Check here if including an attachment with requested information in a format substantially similar to the format below.

Name (first, middle, last, maiden, aliases)	Mailing Address	% of Distributive Income	\$ Value of Distributive Income (Direct and Indirect)

Trusts: Each Disclosing Entity that is a trust associated with each QP shall provide the name, address, date of birth, and percentage of interest of all beneficiaries whose interest in the trust is at least 7.5%.

Check here if including an attachment with requested information in a format substantially similar to the format below.

TABLE - 3			
Name (first, middle, last, maiden, aliases)	Date of Birth	Mailing Address	% Interest

Certify that the following statements are true.

I have disclosed all individuals or entities that hold an indirect or direct ownership interest in the Disclosing Entity.

Yes No

I have disclosed distributive income for all individuals or entities that hold an indirect or direct ownership interest in the Disclosing Entity.

Yes No

I have disclosed to the State all earnings associated with the Disclosing Entities participating with the VPP.

Yes No

STEP 3
DISCLOSURE OF LOBBYIST OR AGENT

Yes No. Have you previously or currently retained or contracted any registered lobbyist, lawyer, accountant, or other consultant to prepare the financial disclosure required under 30 ILCS 540/9?

STEP 4
SIGN THE DISCLOSURE

This disclosure is signed, and made for all entities, by an authorized officer or employee on behalf of the Disclosing Entity. This disclosure information is submitted on behalf of:

Name of Disclosing Entity: IRT Funding Trust

BY: U.S. Bank Trust National Association, not in its individual capacity but solely as Owner Trustee of IRT Funding Trust

Signature:  _____

Date: July 10, 2019

Printed Name: Brian Kozack

Title: Vice President

Phone Number: 312-332-7821

Email Address: brian.kozack@usbank.com

IRT Funding Trust
Table 1 and Table 2
Ownership Share and Distributive Income
07/01/18 - 06/30/2019

TABLE – 1 and 2		Mailing Address		% of Ownership/Interest		Type of Ownership		Class of Stock		Gross Revenues (1)		% of Distributive Income		\$ Value of Distributive Income (Direct and Indirect) (2)	
Name (first, middle, last, maiden, aliases)															
Barclays Bank, PLC		745 7th Avenue New York, NY 10019		100%	Notes	N/A		\$	4,828,546	100%	\$		3,254,744		
Bluestone Capital Markets, LLC		700 W. Morse Blvd, Suite 220, Winter Park FL 32789		100%	Trust Certificate	N/A		\$	-	100%	\$		-		

(1) Accrued interest income earned by the noteholder or accrued certificate income for the certificate holder from 7/1/2018 to 6/30/2019.
(2) Interest income received by the noteholder or certificate income paid to the certificate holder from 7/1/2018 to 6/30/2019.

Supplemental Schedule disclosing individuals with direct and indirect interest in Bluestone Capital Markets, LLC

Name (first, middle, last, maiden, aliases)	Date of Birth	Mailing Address	% of Ownership/Interest	Type of Ownership	Class of Stock	Gross Revenues (1)	% of Distributive Income	\$ Value of Distributive Income (Direct and Indirect) (2)
Alan H. Ginsburg		700 West Morse Blvd, Suite 220, Winter Park, FL 32789	25.86%	LLC membership interest	N/A	\$	25.86%	\$
Gene Harris Family		Winter Park, FL 32789	12.93%	LLC membership interest	N/A	\$	12.93%	\$
Aaron J Gorovitz Family		Maitland, FL 32751	12.93%	LLC membership interest	N/A	\$	12.93%	\$
Brian Hynes		Dorado, PR 00646	25.00%	LLC membership interest	N/A	\$	25.00%	\$
David Reape		Newton Square, PA 19073	13.53%	LLC membership interest	N/A	\$	13.53%	\$
Jeffrey Balvanz		San Juan PR 00909	0.50%	LLC membership interest	N/A	\$	0.50%	\$
Howard & Howard Attorneys PLLC (3)		200 South Michigan Ave, Suite 1100, Chicago, IL 60604	5.01%	LLC membership interest	N/A	\$	5.01%	\$
Manchester Securities Corp (4)		40 West 57th Street, 4th Floor, NY, NY 10019	1.36%	LLC membership interest	N/A	\$	1.36%	\$
Beresford Energy Corp (4)		40 West 57th Street, 4th Floor, NY, NY 10019	2.88%	LLC membership interest	N/A	\$	2.88%	\$
Totals			100.00%			\$	100.00%	\$

(1) Accrued certificate income from 7/1/2018 to 6/30/2019.
(2) Certificate income paid to the certificate holder from 7/1/2018 to 6/30/2019.
(3) Howard & Howard Attorneys PLLC is a national law firm with approximately 110 partners.
(4) Manchester Securities Corp and Beresford Corp are hedge funds who may have hundreds of beneficiaries based on which funds hold the ownership.

IRT Funding Trust
Table 3
Additional information for Trusts
07/01/18 - 06/30/2019

TABLE – 3		IRT Funding Trust - Ownership	
Name (first, middle, last, maiden, aliases)	Certificate Holder	Closing Date	Mailing Address
Bluestone Capital Markets, LLC, see supplemental information above		6/21/2017	700 W. Morse Blvd, Suite 220, Winter Park FL 32789
			% of Ownership/Interest
			100%