

**Name of Regulated Entity:** *Cumberland Partners LLC*

**Report Period:** *First Quarter of 2019*

**I. CONTRIBUTIONS made to officials of a municipal entity (list by state)**

State	Complete name, title (including any city/county/state or other political subdivision) of municipal entity official	Contributions by each contributor category (i.e., for purposes of this form, dealer, dealer controlled PAC, municipal finance professional, municipal finance professional controlled PAC, non-MFP executive officer, municipal advisor, municipal advisor controlled PAC, municipal advisor professional, municipal advisor professional controlled PAC, and non-MAP executive officer). For each contribution, list contribution amount and contributor category (disclose all applicable categories for each contributor). (For example, \$500 contribution by non-MFP executive officer)
		If any contribution is the subject of an automatic exemption pursuant to Rule G-37(j), list amount of contribution and date of such automatic exemption.

*None*

**II. PAYMENTS made to political parties of states or political subdivisions (list by state)**

State	Complete name (including any city/county/state or other political subdivision) of political party	Payments by each contributor category
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*None*

**III. CONTRIBUTIONS made to bond ballot campaigns (list by state)**

**A. Contributions**

State	Official name of bond ballot campaign and jurisdiction (including city/county/state or other political subdivision) for which municipal securities would be issued and the name of the entity issuing the municipal securities	Contributions, including the specific date the contributions were made, by each contributor category
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*None*

**B. Reimbursement for Contributions**

List below any payments or reimbursements, related to any disclosed bond ballot contribution, received by each dealer, municipal finance professional, non-MFP executive officer, municipal advisor, municipal advisor professional, or non-MAP executive officer from any third party, including the amount paid and the name of the third party making such payments or reimbursements.

*None*

**IV. MUNICIPAL ENTITIES with which the regulated entity has engaged in municipal securities business or municipal advisory business (list by state)**

**A. Municipal Securities Business**

State	Complete name of municipal entity and city/county	Type of municipal securities business (negotiated underwriting, private placement, financial advisor, or remarketing agent)
<i>None</i>		

**B. Municipal Advisory Business**

State	Complete name of municipal entity and city/county	Type of municipal advisory business (advice or solicitation) (and in the case of municipal advisory business engaged in by a municipal advisor third-party solicitor, the name of the third party on behalf of which business was solicited and the nature of the business solicited (municipal securities business, municipal advisory business or investment advisory services))
<i>CT</i>	<i>CAPTRUST Financial Advisors, LLC, Greenwich</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>IL</i>	<i>Northern Trust Global Advisors, Inc., Chicago</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>OK</i>	<i>University of Oklahoma Foundation, Inc., Norman</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>DC</i>	<i>University System of Maryland Foundation</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>VA</i>	<i>Virginia Polytechnic Institute and State University, Blacksburg</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>IL</i>	<i>The University of Chicago, Chicago</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>VA</i>	<i>College of William and Mary, Williamsburg</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>NJ</i>	<i>The Concord Advisory Group Ltd., Princeton</i>	<i>Solicitation; Harvey Partners, LLC; Investment advisory services</i>
<i>CA</i>	<i>Callan Associates, Inc., San Francisco</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>NH</i>	<i>Prime Buchholz &amp; Associates Inc, Portsmouth</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>NY</i>	<i>Colonial Consulting, LLC, New York</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>VA</i>	<i>University of Richmond, Richmond</i>	<i>Solicitation; Invenire Partners, LP; Investment advisory services</i>
<i>FL</i>	<i>University of Florida,</i>	<i>Solicitation; Invenire Partners, LP;</i>

**B. Municipal Advisory Business**

State	Complete name of municipal entity and city/county	Type of municipal advisory business (advice or solicitation) (and in the case of municipal advisory business engaged in by a municipal advisor third-party solicitor, the name of the third party on behalf of which business was solicited and the nature of the business solicited (municipal securities business, municipal advisory business or investment advisory services))
GA	Gainesville University of Georgia, Athens	Investment advisory services Solicitation; Invenire Partners, LP; Investment advisory services
VA	Virginia Commonwealth University, Richmond	Solicitation; Invenire Partners, LP; Investment advisory services
IL	University of Illinois, Chicago	Solicitation; Invenire Partners, LP; Investment advisory services
MI	Western Michigan University, Kalamazoo	Solicitation; Invenire Partners, LP; Investment advisory services

**C. Ballot-Approved Offerings**

Full name of the municipal entity and full issue description of any primary offering resulting from the bond ballot campaign to which each contributor category has made a contribution and the reportable date of selection on which the regulated entity was selected to engage in the municipal securities business or municipal advisory business.

Full Name of Municipal Entity	Full Issue Description	Reportable Date of Selection
None		

## FORM G-37



**Signature:** electronic

**Date:** *Apr 15, 2019*

**Name (must be officer of regulated entity):** *Susan Bryant*

**Address:** *6750 Poplar Avenue, Memphis, TN 38138*

**Phone:** *405-606-4728*

Submit to the Municipal Securities Rulemaking Board a completed form quarterly by due date (specified by the MSRB)