Morningstar's Guide to Interval Funds
Strengths, weaknesses, and uses.

Morningstar Manager Research
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Executive Summary

Growth in interval funds and their assets under management has been pronounced over the past decade, bucking the trend of persistent outflows from most actively managed strategies. Amid fee compression and stiff competition from indexing, asset managers have gravitated toward interval funds. Many of their investment strategies cannot be replicated by passive options, and their profit margins consequently are likely to remain robust. But are these investment vehicles good for investors?

Interval funds combine features of both open- and closed-end fund structures, creating their own unique strengths and weaknesses. The interval fund market has surged partly in response to demand for products that allow regular investors and advisors ongoing access to investment strategies that historically were the purview of institutional investors. By limiting withdrawals to a few times per year, these strategies enable managers to buy and hold assets whose prospective return includes a significant illiquidity premium while blunting the risk that investor redemptions might trigger forced sales. The withdrawal limitation, however, also makes interval fund investments relatively illiquid themselves, relegating them at best to a complementary role within a diversified portfolio, and at worst to an expensive and unnecessary complication.

Key Takeaways

- Over the past 10 years through May 2024, assets under management in interval funds have grown almost 40% per year to over USD 80 billion, though they still account for only a small percentage of pooled investment vehicle assets.
- The interval funds market is skewed toward its biggest players, the top five of which oversee about 60% of the assets under management, versus a 43% share for the top five managers of active mutual funds and exchange-traded funds, as of April 2024.
- The current average prospectus adjusted expense ratio across all interval fund share classes is 2.49%, compared with 0.58% and 0.99% for ETFs and mutual funds, respectively.
- Continuously offering their shares to the public at their current net asset value, interval funds eliminate the problematic discounts and premiums associated with closed-end structures.
- By limiting withdrawals to regular predetermined periods and percentages, the interval structure allows managers to buy and hold assets whose prospective return includes a significant illiquidity premium and associated risks.
- With a legal framework derived from the Investment Company Act of 1940 and relatively modest minimum investment levels, interval funds allow even retail investors to gain exposure to those illiquid assets.

- Interval funds' complex structure, however, can be difficult for investors to navigate, and their limited withdrawal periods make interval fund allocations relatively illiquid themselves.
- Interval funds' illiquid investments remain a source of risk, with a return premium that may never materialize, and the current market includes niche products and strategies that increase portfolio complexity but may not add long-term value.
- The interval fund structure is susceptible to abuse, overall investor protections notwithstanding.
- In addition to interval funds being much more expensive than the average exchange-traded or open-end fund, some of their fee structures pose a conflict of interest.

Introduction

Interval funds give smaller investors ongoing access to strategies and assets that would otherwise be out of their reach. Whereas the SEC caps illiquid investments in open-end mutual funds at 15% of assets, interval funds face no such limitation, provided managers can meet periodic investor redemption requests of at least 5% of assets. These redemption opportunities are typically offered quarterly but can be monthly, semiannually, or annually. Limiting redemptions to a fixed schedule with caps on the total redemption amount makes interval funds relatively illiquid themselves and can prevent investors from retrieving their entire investment even over multiple quarters if too many fellow investors want out at the same time. This risk isn't just hypothetical but real and will be illustrated through the Wildermuth Fund later in this paper.

Redemption challenges notwithstanding, interval funds have become increasingly popular in recent years because they can provide investors access to assets with income or diversification benefits that have been historically unavailable to all but the wealthiest. As a sign of interval funds' rising popularity, Capital Group (the advisor to the American Funds) in May 2024 announced a partnership with KKR to offer interval funds that invest in a mix of public and private fixed-income securities. With more than USD 2 trillion in assets under management currently, Capital Group is the world's largest active manager and not known for rash or faddish decision-making. Its entrance into the market is likely to hasten the growth trend of interval funds, which has been decades in the making.

This paper aims to demystify interval funds and equip investors and advisors to accurately assess the strengths and weaknesses of this fund type. It begins with the history of interval funds from their early 1990s origins to the present before comparing them with open-end and exchange-traded funds. A detailed overview of interval funds' structure follows, along with sections on their strengths and weaknesses. The major parts may be read in any order.

History

Early 1990s Origins: From Tender-Offer to Interval Funds and ETFs

Although subject to the Investment Company Act of 1940, interval funds did not emerge until after the SEC's Division of Investment Management published its May 1992 report, "Protecting Investors: A Half Century of Investment Company Regulation." This report recommended adopting "a new exemptive rule under section 22 of the Investment Company Act permitting new variations on the open-end form…interval companies, whose shareholders could redeem at fixed regular intervals, such as monthly.”[1]

The report commended interval funds as an improvement on tender-offer funds, which themselves were an attempt to improve on traditional closed-end funds while preserving flexibility to invest in assets with a significant illiquidity premium. With their capital base closed and number of shares fixed since their IPO, traditional closed-end fund shares trade between investors on an exchange, thereby enabling managers to invest in illiquid assets without worrying about meeting daily redemptions. An open-end mutual fund’s number of shares, in contrast, expands or contracts as money flows in or out each day, which lets investors transact with the fund company at net asset value but hampers managers’ ability to buy illiquid assets because they do have to worry about meeting daily redemptions.

If the ability to buy and hold illiquid assets is the strength of traditional closed-end funds, their weakness is the persistent divergence and often discount between the market value their shares trade at and the net asset value of those shares. Continuously offered closed-end funds with tender-offer features debuted in 1988 with leveraged loan ”prime rate” closed-end funds that typically made quarterly tender offers at net asset value to provide shareholder liquidity rather than letting their shares trade on an exchange.

In the early days of tender-offer funds, filing and registration fees and other costs related to their quarterly redemption offers proved cumbersome, and the funds committed only to considering a tender offer each quarter, not to making one. Even when they did make one, there was no set regulatory minimum or range for the redemption amount. The SEC’s 1992 report proposed the creation of interval funds to solve these problems. It suggested giving investors the ability to redeem shares at fixed regular periods and requiring prominent disclosure of a fund's limits on redeemability.

Shortly after the SEC recommended the interval fund structure, the first exchange-traded fund, the SPDR S&P 500 ETF Trust, debuted on the American Stock Exchange in January 1993. If interval funds shrink the potential gap between the market value and net asset value of traditional closed-end fund shares by letting investors periodically sell some shares at the latter, exchange-traded funds represented an attempt to close that gap. As with closed-end funds, investors can sell ETF shares to and buy them from one another, but if too few sellers emerge to meet demand or buyers to satisfy sellers, so-called *authorized participants* step in to keep shares from trading at a premium or discount to their underlying net asset value.

To avoid premiums, an authorized participant puts up capital to buy a basket of the fund’s underlying holdings and bundles them to create new ETF shares to sell into the marketplace. In doing so, they get to keep whatever gap had developed between the value of the underlying holdings and the new shares they’ve created and sold.

1 United States Securities and Exchange Commission. 1992. "Protecting Investors: A Half Century of Investment Company Regulation." May 1, 1992. https://www.sec.gov/divisions/investment/guidance/icreg50-92.pdf.

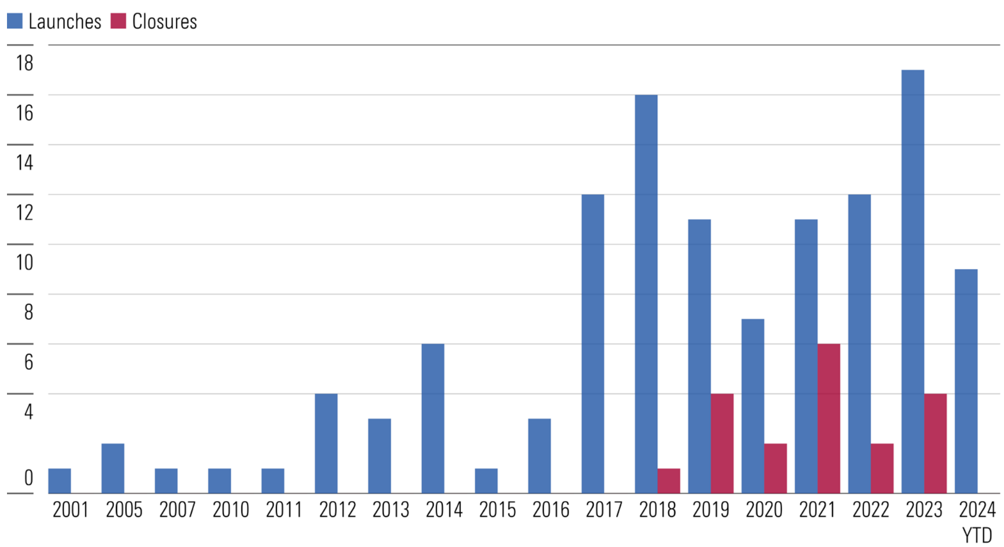
To avoid discounts, they buy existing shares and effectively dismantle them by taking out the underling holdings and selling them. In turn, they get to keep whatever gap had developed between the (lower) price of the ETF shares and the higher value of the holdings they've sold.

This arbitrage activity keeps ETF shares' market values close to their underlying net asset values in most cases. That mechanism comes at the cost, though, of not being able to close ETFs to new investors. This is a point to which we shall return.

Evolving Interval Funds Landscape: From the 2000s to the Present

While the 1990s laid the groundwork, interval fund launches did not begin until the early 2000s, and only one or two a year appeared until 2012.[2] Launches did not hit double digits until 2017, and in 2018, one or more began closing each year alongside 12 new ones appearing on average through 2023.

Exhibit 1 Interval Funds: Launches and Closures



Source: Morningstar Direct. Data as of May 31, 2024.

Early on, interval funds' appeal in the post-financial-crisis era of ultralow interest rates was their ability to buy less-liquid assets and propensity to use investment leverage to generate more income than traditional core fixed-income funds' low-single-digit percentage yields. As a result, income-generating sectors, such as bank loans, structured credit, and real estate, dominated interval fund launches. Even though traditional core and core-plus bond mutual funds and ETFs now generate 4%-6% yields, interval funds' skew toward credit and leverage remains, and their yields are now in the 9%-11% range. As of April 2024, taxable-bond, real estate, and municipal-bond funds made up more than two thirds of the interval funds in the Morningstar Direct database.

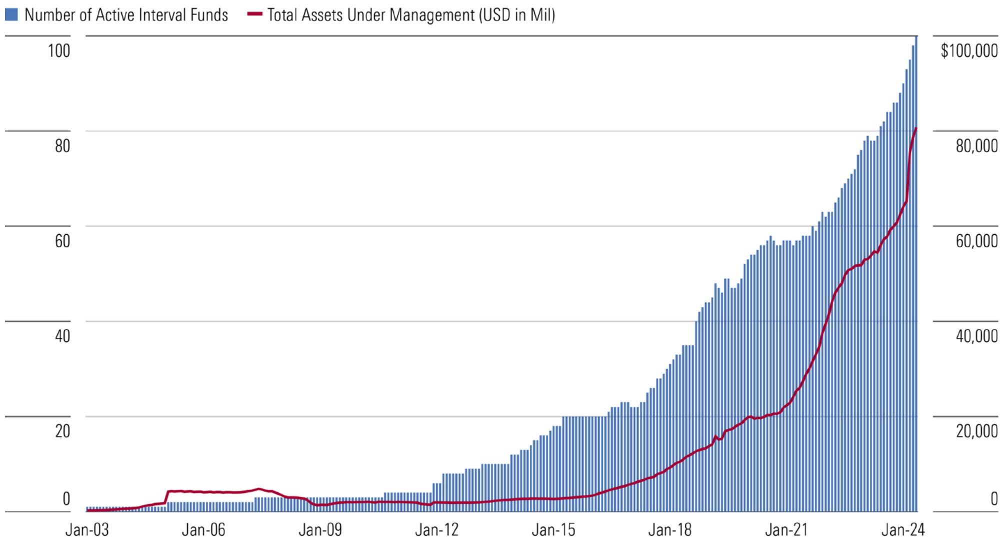
2 Invesco Senior Loan IB debuted in 1989 as a tender-offer closed-end fund and converted into an interval fund in 2005.

Exhibit 2 Interval Funds by Morningstar Group & Category

Interval Funds by Morningstar Group & Category	Number of Funds	Assets Under Management USD (Mil)
Taxable Bond	**57**	**45,618.0**
High Yield Bond	3	20,341.3
Nontraditional Bond	22	10,494.1
Bank Loan	15	7,562.3
Multisector Bond	12	6,811.7
Intermediate Core-Plus Bond	1	262.5
Ultrashort Bond	1	85.5
Emerging Markets Bond	1	31.6
Miscellaneous Fixed Income	1	28.5
Intermediate Government	1	0.4
Sector Equity	**22**	**14,312.4**
Global Real Estate	2	6,793.9
Real Estate	10	5,674.8
Miscellaneous Sector	6	1,541.0
Infrastructure	3	243.1
Technology	1	59.6
US Equity	**1**	**8,444.5**
Large Growth	1	8,444.5
Allocation	**9**	**5,220.0**
Global Allocation	4	3,966.0
Moderate Allocation	5	1,254.0
Alternative	**4**	**4,786.2**
Multistrategy	3	4,770.2
Options Trading	1	16.0
Municipal Bond	**6**	**2,162.0**
Muni National Interm	1	1,428.4
High Yield Muni	3	566.6
Muni California Intermediate	1	117.2
Muni National Long	1	49.8
Other	**1**	**212.6**
China Corporate Bond	1	212.6
Total	**100**	**$80,755.6**

Source: Morningstar Direct, Fund company filings. Data as of May 31, 2024, or most recent holdings disclosure.

Exhibit 3 Growth of Interval Funds



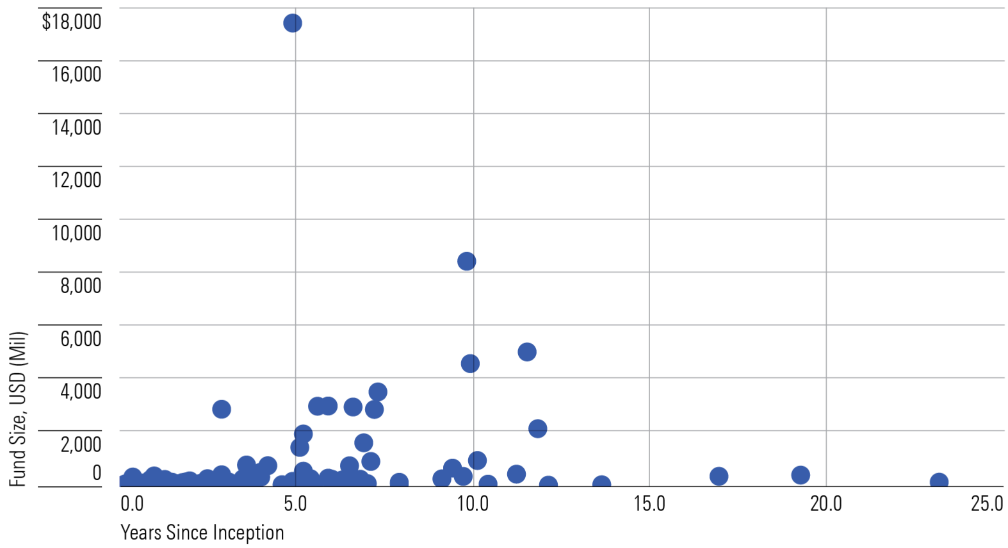
Source: Morningstar Direct, Fund company filings. Data as of May 31, 2024, or most recent holdings disclosure.

Still, the interval funds landscape has evolved. It now includes strategies that invest in private equity or venture capital, whether through other funds or direct investments. The massive growth of financial markets since the global financial crisis also created or gave a boost to dozens of new markets and security types, including direct lending and cryptocurrency, as well as insurance-linked securities (also called *catastrophe bonds*), that often do not fit cleanly into mutual funds or hedge funds but which have found more natural homes within interval funds. For example, Stone Ridge Art Risk Premium Fund appeared in March 2023 to provide investors with exposure to the art market.

Growth in the number of interval funds and their assets under management since the early 2000s has been substantial, especially over the past decade. Ten years ago, Morningstar tracked 14 interval funds with about USD 2.9 billion in assets. As of June 2024, Morningstar tracked 100 with over USD 80 billion in assets, an annualized growth rate of 39%. The pace of growth for strategies garnering the most interest has been even faster. Cliffwater Corporate Lending, the biggest interval fund, with more than USD 19 billion in assets as of early 2024, only launched in June 2019.

Overall, though, the interval fund landscape has grown in fits and starts, and it remains mostly a market of individual funds rather than a set of robust categories and peer groups. The success or failure of a strategy is often as much or more a product of the environment in which the firm launched it and the marketing dollars spent as on its investment merit. In contrast to Cliffwater Corporate Lending, for instance, Voya Credit Income (formerly Voya Senior Income) debuted over 20 years ago and has less than USD 120 million in assets (though it did reach over USD 2 billion in mid-2006).

Exhibit 4 Fund Size Versus Years Since Inception

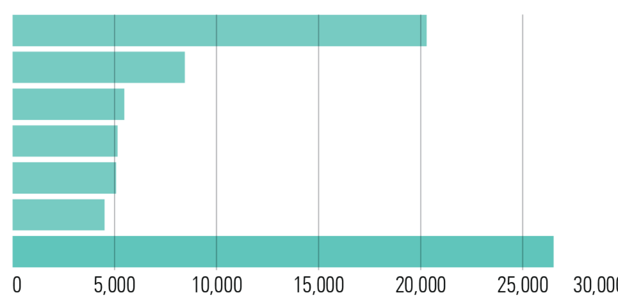


Source: Morningstar Direct, Fund company filings. Data as of March 31, 2024.

The interval funds market is also skewed toward its biggest players, Cliffwater, ACAP, Bluerock, Apollo, and Versus Capital. These five advisors now run about 60% of interval fund assets. That composition is likely to change after Capital Group, in partnership with KKR, enters the market in 2025, but the interval funds market is likely to remain more top-heavy than that of actively managed mutual funds and ETFs, whose top five advisors (Capital Group, Fidelity, Vanguard, T. Rowe Price, and J.P. Morgan) run about 43% of the USD 16.2 trillion of assets in those strategies, as of April 2024.

Exhibit 5 Market Share of Interval Fund Firms

Firm	Number of Funds	Interval Funds AUM (USD in Mil)
Cliffwater	2	20,294
ACAP	1	8,445
Apollo	2	5,481
Bluerock	2	5,151
Versus	3	5,080
PIMCO	5	4,519
Rest of the Market	80	26,515



Source: Morningstar Direct, Fund company filings. Data as of March 31, 2024.

Those figures also show, however, that the interval funds market remains small compared with those of actively managed open-end and exchange-traded funds, to say nothing of the contrast if passively managed assets were included. The perceived use cases of interval funds are wider than a decade ago, and investor demand may prove sticky. While interval funds' unique features enable access to these various investments, they can also create an arcane and potentially frustrating experience.

Comparison: Interval, Open-End, and Exchange-Traded Funds

Earlier, we discussed how the SEC's May 1992 report led to the creation of interval funds as an attempt to improve on tender-offer funds, which themselves were an attempt to improve on traditional closed-end funds while preserving flexibility to invest in assets with a significant illiquidity premium.[3] More should now be said about how interval funds compare with both open-end and exchange-traded funds.

Exhibit 6 Fund Types Comparison

	Private Fund	Closed-End Fund	Interval Fund	Mutual Fund	ETF
Investment Type	Closed-end	Closed-end	Closed-end	Open-end	Open-end
Listed on Exchange	No	Yes	No	No	Yes
NAV Calculation	Varies	Daily	Typically Daily, Sometimes Weekly	Daily	Intraday
Redemption Frequency	Varies	N/A	Every 3, 6, or 12 Months	Daily	Intraday
Appropriate for Illiquid Assets?	Yes	Yes	Yes, within limits	No	No
SEC Limit on Illiquid Assets	No	No	No	15%	15%
Tax Reporting Form	Typically K1	1099	1099	1099	1099
Can be closed to new investors?	Yes	N/A	Yes	Yes	No

Source: Regulatory filings. Data as of May 31, 2024.

Open-end, exchange-traded, and interval funds are alike in that investors can buy and sell at or very close to their respective shares' net asset value, but access to them is asymmetrical. All three are easy to get into, as investors can buy each business day, yet only open-end and exchange-traded funds are easy to get out of. While open-end and exchange-traded fund investors can sell all their holdings on any given trading day, interval fund investors must wait for periodic redemption windows to sell their shares back to the fund company. Even then, exiting their full position is not guaranteed if too many fellow investors want out at the same time.

Investors' limited ability to redeem shares both in terms of timing and amount makes interval funds more-suitable vehicles for investing in illiquid assets, such as private placements, than open-end funds. That said, open-end managers can invest up to 15% of fund assets in illiquid assets. Most open-end managers do not do so at all, while those that do tend to keep exposure below 5% of assets. Still, there are exceptions. At year-end 2018, manager Danton Goei of Selected International invested 12.72% of that fund's assets in three then-private Asian companies, ride-hailing services DiDi Chuxing of China and Grab of Singapore, which DiDi partially owned, as well as Chinese food-delivery service Meituan Dianping. That kind of concentration in illiquid investments is more suitable for interval funds.

An important management tool for open-end and interval fund managers, who both face the challenge of putting new money to work each day, is the ability to close their funds to new investors or even all investors if necessary. While best-in-class open-end managers have shown a willingness to use this tool

3 As noted, filing and registration fees and other costs proved cumbersome, and the funds committed only to considering a tender offer each quarter, not to making one. Even when they did make one, there was no set regulatory minimum or range for the redemption amount.

in capacity-constrained asset classes, like small-cap stocks or high-yield bonds, no interval fund manager has taken this step, though they could.

Exchange-traded funds, by contrast, cannot close their portfolios to inflows, as mentioned previously. That makes them most suitable for categories like large blend and ultrashort bond (the two Morningstar Categories with the most actively managed ETF assets) whose exposures are less likely to be diluted by large inflows.[4] It also makes ETFs unsuitable for investing in capacity-constrained parts of the public market, much less directly in private assets, even if an ETF like Invesco Global Listed Private Equity can provide indirect exposure. The strength of the interval fund structure, on the other hand, is that it enables managers to buy and hold illiquid assets without the worry of daily redemptions while also preserving the ability, albeit limited and to some extent uncertain, for investors to redeem holdings at their net asset value.

Relative to ETFs, though, interval fund managers charge a hefty premium for the privilege. The asset-weighted prospectus-adjusted expense ratio for actively managed ETFs is currently 0.42%, versus 2.11% for interval funds.

Interval Fund Structure in Theory and Practice

Periodic Redemption Window

The most arcane feature of an interval fund is also its most important: the periodic redemption window. Unlike traditional mutual fund shares, which investors can sell back to the fund company at the end of every business day at net asset value, and listed closed-end fund and ETF shares, which can be sold on the secondary market during trading hours, investors can only sell interval fund shares back to the fund company during specific windows that must occur at least once per year.

The industry standard cadence for periodic repurchase offers is quarterly, although some funds offer them monthly or semiannually. An interval fund board can change that periodicity and/or elect to offer discretionary repurchase offers between formal ones. Bow River Capital Evergreen, for example, pairs semiannual formal repurchase offers with two discretionary offers to re-create a quarterly cadence, but those discretionary offers are not guaranteed.

A fund company opens the repurchase window with a written notice sent to each shareholder. This "notice date" is typically 21 days before the repurchase request deadline, but it can be up to 42 days beforehand. It is also available to prospective investors via an interval fund's name or ticker on the SEC's EDGAR search under form N-23C3A, "Notification of periodic repurchase offer."[5]

The content of each written notice, subject to SEC guidelines, contains the following information:

4 Armour, B., Jackson, R., Evens, Z., et al. 2024. "Morningstar's Guide to US Active ETFs." https://www.morningstar.com/business/insights/research/guide-to-us-active-etfs

5 https://www.sec.gov/edgar/searchedgar/companysearch

- Effective Date: The date that the written notice is effective, announcing the start of the periodic repurchase offer.
- Deadline: The date on which the investor's repurchase request is due (the deadline).
- Share Redemption Percentage: The percentage of outstanding shares that the fund is offering to repurchase (typically 5%), and how the fund will purchase shares on a pro rata basis if the offer is oversubscribed (that is, if investors collectively try to sell more shares than the fund offered to repurchase).
- NAV Date: The date that will be used to determine the fund's net asset value for the repurchase.
- Payment Date: The date by which the fund will pay to investors the proceeds from their repurchased shares.

The date used to determine the fund's NAV for the repurchase is typically the same date as the repurchase deadline itself, although sometimes this NAV pricing date is before or after the repurchase deadline. Per the SEC, it can be up to 14 days after the repurchase deadline, and it should always be detailed in the written repurchase notice that shareholders receive from the asset manager.

Some pricing uncertainty surrounds the redemption process since shareholders do not know the exact share price they'll receive when submitting a repurchase request. If the interval fund holds sizable illiquid assets, then the fund's NAV is unlikely to change much between the request and NAV dates. There is a risk of loss, especially if the full 14 days elapse between the deadline and NAV dates. On the other hand, a gain could materialize in that period as well. There is also some pricing uncertainty, albeit less, surrounding open-end fund share redemptions. A mutual fund sale order submitted just after the market close on Friday, for example, will not be filled until the closing NAV on Monday, three days later.[6]

Whatever the NAV date, investors must wait a bit longer to receive their money. In contrast to the standard two business days that it takes to receive open-end money after a redemption, interval fund payments can occur up to seven days after the NAV date, according to the SEC. And shareholder repurchase requests can be withdrawn or modified any time before the deadline, but after that they cannot be altered.

Redemption Amount: 5% to 25%

The SEC dictates that at least 5% and up to 25% of outstanding interval fund shares may be sold back to the fund company during a single redemption window. The fund's board, in consultation with its managers, sets the exact percentage within that range, which can—though often does not—vary with each redemption window. The industry standard is 5% per quarter, which means most interval fund managers should be prepared for outflows of up to 20% each year.

There is, however, some flexibility in determining redemption amounts beyond simply picking a percentage between 5% and 25%. The SEC allows fund managers to redeem an additional 2% during

6 If, for some reason, a shareholder is unable to find the fund's current NAV, that information can be acquired by calling the fund's transfer agent and asking for it. The number for a particular fund's transfer agent is typically found in both the prospectus and form N-23C3A.

the redemption window without board approval, even after the written notice has been sent to shareholders. Assuming the standard 5% redemption, most funds can "flex" up to 7%, often in response to high demand during periods of market stress. A fund board may also choose to alter the repurchase percentage in response to anticipating increased investor demand, year-end tax considerations, or an idiosyncratic event such as a change in investment objective.

If an interval fund’s redemption offer is oversubscribed, withdrawals are managed on a pro rata basis. The one exception is shareholders who own less than 100 shares and wish to sell all their shares. In that case, their redemption will be met, even if total repurchase demand is greater than what the fund offered and repurchases are moved to pro rata.

Leverage

As with open- and closed-end funds, prospectus guidelines typically allow interval funds to use financial leverage. For every three dollars of assets, one of those can be borrowed. That translates into up to 33% of fund assets coming from leverage (if the borrowed dollar is in the numerator and the three dollars of assets are in the denominator) or a leverage ratio of 150% or 1.5 times (if the total assets of three dollars are in the numerator and the two dollars of net assets are in the denominator).

Interval funds can borrow money from an institution like a bank to generate financial leverage, as can open- and closed-end funds, or they can issue preferred shares to generate leverage, which closed-end funds can also do (but not open-end funds). Using leverage in interval funds amplifies their potential return as well as their risk since it magnifies performance in both directions, and the forced unwinding of leverage during an outflow cycle is one of the surest ways to destroy wealth.

Surveying and Assessing Periodic Redemption Windows, Amounts, and Use of Leverage

Interval fund structural norms allow for a fair amount of variation in practice. Consider the NAV date, which can be on or up to 14 days after the repurchase deadline. In a representative sampling of 69 interval funds, all but seven used a pricing date the same as the repurchase deadline.

Exhibit 7 Pricing Dates in Relation to Redemption Deadline

Pricing Date in Relation to Redemption Deadline	Number of Interval Funds
After	6
Before	1
Same Date	62

Source: Fund company filings. Data as of May 31, 2024.

In a similar representative sampling, six interval funds allowed 10% redemptions, one allowed 8%, and one allowed 7.5%. The cadences of those percentages differed, though. Among the four permitting monthly redemptions, one allowed up to 8% each time. On the other end of the spectrum, one fund allowed semiannual redemptions of only 5%. The majority, as noted previously, offer a quarterly redemption window, typically of 5% but in six cases of up to 10%.

Exhibit 8 Redemption Frequencies and Percentages

Redemption Frequency	Redemption Percentage	Number of Funds
Monthly		**4**
	5%	2
	6%	1
	8%	1
Quarterly		**68**
	5%	61
	8%	1
	10%	6
Semi Annual		**1**
	5%	1
Semi Annual (+ discretionary)		**1**
	5%	1

Source: Fund company filings. Data as of May 31, 2024.

A higher redemption percentage could signal that the manager believes the strategy to be more liquid than the average interval fund. Investors concerned with the ability to get their money out may want to prioritize such funds, or at least those that are regularly willing to use that flexible 2% upward adjustment.

On the other hand, offering to redeem more than 5% of fund assets, much less the 25% maximum allowed by the SEC, undermines the primary appeal of interval funds over open- and exchange-traded funds: their ability to buy and hold less-liquid assets. Increasing potential outflows increases the portfolio's liquidity needs, thereby limiting the amount of less-liquid assets the managers can buy, potentially reducing total returns, and harming shareholders who stay invested during heavy outflows. Even for funds whose period redemption window amounts and cadences have been consistent, it is important to remember that an interval fund board can alter each.

While limited redemption opportunities and amounts can pose challenges for investors eager to get their money back, they can make it easier to maintain financial leverage to access a larger stake in less-liquid assets. That will inherently add risk to a portfolio, though, and a fund pushing its leverage ratio toward the 150% limit while investing a significant percentage of its portfolio in Level 3 assets would be a red flag. (Level 3 is an accounting designation found in annual and semiannual reports that identifies the hardest to value and potentially the least liquid assets in a portfolio.)

A higher leverage ratio can be utilized with care while investing in assets with settlement times of two to three weeks, like bank loans or structured credit, which is typically at the more liquid end of the interval fund market. That’s true of the bank-loan-heavy interval strategy Lord Abbett Floating Rate High Income, for example. Its year-end 2023 portfolio combined a 132% leverage ratio (total assets/net assets) with just a 0.89% stake in Level 3 assets, suggesting sufficient liquidity to meet periodic redemptions, at worst at the cost of drawing on a line of credit if had to wait for some trades to settle.

It's also possible for interval fund portfolios to responsibly hold large stakes in Level 3 assets if they're not using significant leverage. In the most recent annual or semiannual reports for Stone Ridge Art Risk Premium Fund and the private-equity-focused strategies Sweater Cashmere and The Private Shares Fund, Level 3 assets comprised essentially the whole portfolio of each fund besides cash, but neither was using meaningful traditional borrowed leverage. In a sampling of Morningstar's interval fund database, we couldn't find any glaring examples of a fund with high Level 3 assets and high leverage. The combination remains possible, however.

Interval funds' limitation on withdrawals enables them to use leverage more appropriately and to greater effect than their mutual fund peers, though not to the same effectiveness as closed-end funds that never worry about withdrawals. Interval funds have staked out a middle ground by protecting leveraged portfolios much better than mutual funds can while still giving investors some access to their capital, unlike closed-end funds. But how that leverage is used remains important. Leverage on its own is just a tool—it can boost returns when applied thoughtfully or lead to devastating outcomes when applied carelessly.

Interval Fund Strengths

Access to Illiquid Assets

Interval funds' limited withdrawals make illiquid assets much more at home in their portfolios, which differentiates them from mutual funds and ETFs. ETFs are inclined to very liquid parts of the market like large-cap stocks or ultrashort bonds, while mutual funds rarely make use of their flexibility to hold up to a 15% stake in illiquid assets, which the SEC defines as those that "cannot be sold in current market conditions in seven calendar days without significantly changing the market value of the investment."[7] Cautionary tales exist about open-end funds, like Third Avenue Focused Credit, Fairholme, and Nuveen High Yield Municipal Bond, whose portfolios became or have become increasingly dominated by their illiquid investments because of outflows.

Through interval funds, investors can have access to assets that run the gamut across both public and private markets. That includes direct equity ownership in private companies, private equity or venture capital funds, direct private credit or private credit funds, hedge funds, real estate and its various flavors, bank loans, distressed or restructured debt, structured credit, and catastrophe bonds (also called *insurance-linked securities*). Alternative assets such as art, timberland, litigation finance, and music royalties also fall into this bucket. These assets, and by extension the interval funds that own them, may offer investors a competitive yield, a unique return stream, low or negative correlation to traditional equity and fixed-income markets, or some combination of those qualities.

However, the degree of illiquidity across those assets is not equal. It can range from those that can be sold and settled in two weeks to those that might need to be held for several quarters or years. Bank loans, which can take up to two weeks to settle, are often seen as the "dividing line" between mutual funds and interval funds. There is a robust bank-loan mutual fund market, although many of those funds

7 United States Securities and Exchange Commission. "Investment Company Liquidity Risk Management Program Rules." https://www.sec.gov/divisions/investment/guidance/secg-liquidity

use techniques to manage flows, such as maintaining lines of credit, only investing in the most liquid bank loans, or owning more-liquid assets like high-yield corporate bonds, ETFs, and cash. Bank-loan funds also make up the largest single category of interval funds; within that fund structure, bank-loan managers don’t have to resort to the same techniques as their mutual fund counterparts to avoid liquidity trouble. On the other hand, assets that must be held for years are arguably too illiquid even for an interval fund, at least when held in substantial size. Given their repurchase schemes, most interval fund managers must plan for potential outflows of up to 20% in a single year.

Even though interval funds don’t report illiquid assets based on the SEC’s definition, investors still have tools at their disposal. Interval funds do report Level 3 assets, for example. This is an accounting measure based on how easily observable (or not) the prices are for assets within a fund's portfolio. Highly liquid securities, such as cash, US large-cap equities, and Treasury bonds, fall in the Level 1 bucket. Most of the fixed-income market, including mortgage-backed securities, corporate bonds, and even most syndicated bank loans, fall in the Level 2 bucket. The Level 3 bucket is reserved only for those assets where there is no observable price (for example, visible from a recent trade) and the price is instead estimated based on unobservable inputs.

Morningstar's fixed-income manager research analysts routinely monitor Level 3 assets in the funds they cover, as it is one of the best proxies for illiquidity in publicly disclosed materials.[8] This is especially true for funds that are experiencing heavy withdrawals, as those outflows can lead to Level 3 assets taking up a larger and larger percentage of a portfolio as fund managers sell more liquid holdings to meet redemptions. This "junking up" can put a fund in a precarious position, especially if exacerbated by leverage, perhaps ultimately forcing its liquidation if outflows do not abate.

The previously mentioned Stone Ridge Art Risk Premium Fund, Sweater Cashmere, and The Private Shares Fund are examples of funds at greater risk of this occurring than typical interval funds. All three own assets that almost exclusively fall in Level 3 but prudently have little to no leverage and reasonable-to-high cash allocations, which should allow them to weather a year or two of severe turbulence. But this risk is particularly pronounced for funds that own assets with years-long lockups and only a limited cash buffer. If there is nothing between that cash buffer and those locked-up investments, both the fund and its shareholders are in trouble if outflows reduce cash to zero.

The periodic redemption window means interval funds must still maintain some liquidity. For example, Sweater Cashmere predominantly makes direct venture capital investments. According to its September 2023 semiannual report, Level 3 assets made up 77.3% of its portfolio and cash 18%, near the 20% “worst case scenario” for potential outflows assuming quarterly redemption of up to 5% of assets. If an interval fund portfolio consistently has Level 3 assets of 80% or greater, investors should tread carefully.[9]

8 For an example of this in action, see our colleague Eric Jacobson's Dec. 26, 2023, article "6 Critical Lessons for Bond Investors." https://www.morningstar.com/bonds/6-critical-lessons-bond-investors

9 Level 1/2/3 data can be found in a fund's Annual Report after the Schedule of Investments. It's typically in the "Notes to Consolidated Financial Statements" section. For example, see Cliffwater Corporate Lending Fund's March 2024 Annual Report, where Level 1/2/3 data is found on Page 117. https://cliffwater.com/files/cliffwaterfunds/data/pdfs/literature/cclfAR.pdf

1940-Act Protections

Interval funds are registered with the Securities and Exchange Commission and regulated under the Investment Company Act of 1940, a landmark piece of legislation that has guided the growth and development of the US investment industry for nearly a century.

SEC oversight through the Act is a major strength of interval funds compared with private equity and credit funds, which are under the supervision of the SEC but not similarly regulated. For example, the Act restricts funds' ability to transact with affiliates (self-dealing) and imposes governance requirements, such as an independent board. The Act also requires public disclosure of information about the funds, their holdings, and their sponsors.

Facilitating Better Investor Behavior

While certainly a disadvantage for those yearning for access to their money, periodic redemption windows can encourage better long-term investor behavior. The inability to sell at the first sign of trouble may incline investors to ride out market turbulence and achieve a better long-term result. Investors' uneven ability to time their purchases and sales of mutual funds and ETFs, for example, has been well-documented in Morningstar's annual Mind the Gap research. The 2023 study found that investors' poor timing caused them to miss out on one fifth of their funds' average net returns for the 10-year period ended Dec. 31, 2022.[10]

Additionally, mutual funds and ETFs are often deluged with cash when markets are hot, forcing them to buy at highs during inflow cycles and sell at lows during outflow cycles, which can overwhelm their strategies and wreak havoc on returns. It's hard to buy good assets at cheap prices while simultaneously raising cash to meet redemptions, a dynamic that many mutual fund managers faced in March 2020. Interval funds' limited liquidity for investors can help avoid fire sales at market bottoms, protecting the interests of longer-term investors. Of course, the corollary is that interval funds are a poor match for investors with short- or even medium-term investment horizons.

There is also a risk that the redemption windows could condense outflow demand into large chunks. If a total redemption request is greater than the amount offered by an asset manager (typically 5% of shares) then investors won't get back as much as they hoped and will have to wait until the next redemption offer. It's also likely that many investors will want to sell shares at the same time for similar reasons, such as choppy markets or bad performance, which means it could take years for an investor to get completely out of an interval fund. Aside from panic-selling, though, there may be good reasons to redeem, like a manager or process change or other impairment. But a valid reason to sell doesn't mean the asset manager and fund board are going to raise the offered repurchase amount. That would be best practice, though.

For example, the Ecofin Tax-Advantaged Social Impact Fund increased its Sept. 30, 2022, repurchase offer to 18% from its customary 5%, with a deadline of Nov. 4, 2022. On Nov. 16, 2022, the fund filed

10 Ptak, J. 2023. "Bad Timing Cost Investors One Fifth of Their Funds' Returns." Aug. 2, 2023. Morningstar. https://www.morningstar.com/funds/bad-timing-cost-investors-one-fifth-their-funds-returns

with the SEC to change its moniker to the current Ecofin Tax-Exempt Private Credit Fund and remove its investment policy that aimed to invest at least 80% of assets in the social impact sector. The order of the filings may suggest that the repurchase offer was increased to allow a subset of investors with advance notice of the change to withdraw their money—certainly not best practice. A more generous interpretation might be that all shareholders were notified of the change before the filing, although Morningstar could not find any public information to that effect.

Tax Reporting

Since interval funds are taxed like mutual funds, they offer a familiar tax-reporting process through the 1099 form. Private equity and credit funds organized as partnerships, on the other hand, report taxes through the Schedule K-1 form. Those responsible for generating them are notorious for sending them late in the tax season, and the form is often difficult for all but tax professionals to interpret. The 1099 form gives interval funds a leg up in ease-of-use compared with private funds, putting them on equal footing with mutual funds.

Interval Fund Weaknesses

Illiquidity

Every interval fund prospectus includes some version of this language: "Even though the fund will make quarterly repurchase offers, investors should consider the fund's shares illiquid."[11] That language refers to the shares of the interval fund itself, not the fund's underlying assets. In other words, investments in an interval fund should be considered illiquid, too.

The Wildermuth Fund is a cautionary, if extreme, example of what can go wrong. Over the trailing year ended on March 31, 2023, its I shares lost 25.3%, according to its annual report, while the fund tendered four quarterly repurchase offers for 5% of outstanding shares each. Not one of those offers was sufficient to meet demand, however. For the April 2022 offer, shareholders requested to redeem 27.36% of shares outstanding; for July 2022, 27.9%; for October 2022, 32.8%; and for January 2023, 38.4%. Most of those requests went unfilled.

At the time of its September 2022 semiannual report, 83% of assets were classified as Level 3, and it had minimal cash (USD 225,000, or 0.2% of total assets; there was no leverage). At the same time, it had unfunded capital commitments of USD 7.5 million. By the March 2023 annual report, 84% of assets were classified as Level 3, and it had USD 616,000 in cash (0.7% of total assets), but there was also USD 8.3 million in liabilities, making the fund slightly leveraged despite the nominal increase in cash between the two periods. Because the fund had very little cash during this period, it was seemingly forced to use its line of credit to help meet shareholder redemptions. In the same March 2023 report, the outstanding balance of its line of credit was USD 5.8 million. At various points during the reporting period, it drew on the full amount allowed (USD 10 million) and opened a second line of credit.

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11 Pioneer ILS Interval Fund Prospectus. 2014. https://www.sec.gov/Archives/edgar/data/1616037/000119312514351820/d793306dn2a.htm

These steps weren't enough to save the fund. In a June 29, 2023, prospectus supplement, the fund board announced a plan to liquidate the fund. Both purchases and redemptions would be suspended, and cash distributions to shareholders would only take place periodically as the portfolio was liquidated.[13]

On Nov. 1, 2023, the fund board terminated the agreement with its investment advisor (Wildermuth Advisory) and hired BW Asset Management, a subsidiary of Kroll, to supervise the liquidation plan. In a letter to shareholders dated Jan. 11, 2024, the new portfolio manager wrote that "Most of the PE investments are minority equity positions in early-stage companies with limited sale rights or options. Selling these investments is more challenging and involves (among other things) working with the portfolio companies to understand and prepare for an exit process that will maximize the value for Shareholders (often through a sale of the portfolio company with the cooperation of its shareholders). *This process may take several years for certain investments*." (emphasis added)[12]

The Wildermuth Fund is still in liquidation as of this writing, one year after freezing shareholder redemptions.

Fees

Interval fund fees may be competitive if not cheap compared with most private equity or credit funds, which may levy as much as a 2% annual asset-based charge and take 20% of the profits, but they are high relative to ETFs and open-end funds. The current average prospectus adjusted expense ratio across all interval fund share classes is 2.49%, compared with 0.58% and 0.99% for ETFs and mutual funds, respectively.

The higher fees are a product of multiple factors. Interval funds are generally more expensive to operate than mutual funds or ETFs. There are extra costs associated with trading and valuing the typically less-liquid securities within the fund, including the required pricing services and other operations. There is also platform access, education for investors and advisors, and costs associated with managing the periodic redemption offers. Of course, interval funds also offer better margins to asset managers than mutual funds, where fee competition continues to grind everything cheaper. On the plus side for investors, expenses and investment minimums can be lower than private funds, so those moving from the private world into interval funds may consider them a steal. Nevertheless, lofty price tags set a high return bar for success.

Many of the components of interval funds' fees are similar to those of mutual funds: the management fee, sales loads on A share classes, administrator and accounting fees, and redemption fees if shares are sold within a short time (usually 18 months) of being bought (this last fee is occasionally seen among high-yield and bank-loan mutual funds).

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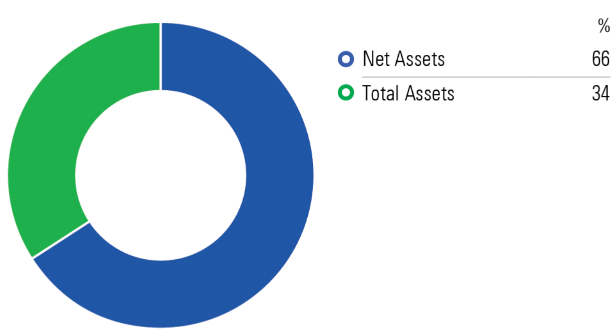
12 Mansfield, M. 2024. "Wildermuth Letter to Shareholders." Jan. 11, 2024. https://wildermuthfund.com/wp-content/uploads/2024/01/20240111-Wildermuth-Letter-to-Shareholders.pdf

There are three extra fee dynamics to keep in mind, however. One is the cost of underlying funds that the interval fund may invest in (similar to fund-of-funds structures), which is called the “Acquired Fund Expense.” Bow River Capital Evergreen Fund, for example, in March 2023 invested 16.3% of its assets in “Primary Funds,” such as TKO Fund, and another 7.9% in “Private Investment Funds,” such as ONEX Fund V, and as a result had an acquired fund expense of 84 basis points. These fees might be present in a mutual-fund-of-mutual-funds, but private funds will generally have higher expenses, which means this expense will be higher among interval funds compared with mutual funds (at least among funds that pursue fund-of-fund strategies). The average acquired fund expense among interval funds was 49 basis points, while among mutual funds, it was 22 basis points.

The second dynamic is how the management fee is charged. While most interval funds charge the management fee on net assets, about one third of them charge that fee on managed assets or total assets—in other words, they're charging investors a fee to manage the money that they’ve had the fund borrow. The argument used to support this practice is that the leveraged portfolio owns more assets than it otherwise would, which creates more work for the asset manager, and therefore they deserve a higher fee. But this practice can directly incentivize an asset manager to leverage a fund because it increases the fees they can collect, even when doing so is not appropriate for the current market environment, the underlying assets, or investor expectations. In Morningstar’s opinion, the best practice is to charge on net assets.

Exhibit 9 Basis for Management Fee



Source: Fund company filings. Data as of May 31, 2024.

Exhibit 10 List of Interval Funds That Charge Their Management Fee on Total Assets

Fund	Ticker	Morningstar Category
1WS Credit Income I	OWSCX	Multisector Bond
AOG Institutional Fund	AOGFX	Moderate Allocation
BlueBay Destra Intl Event-Driven Crdt I	CEDIX	Nontraditional Bond
Bow River Capital Evergreen I	EVERX	Moderate Allocation
Carlyle Tactical Private Credit A	TAKAX	Nontraditional Bond
CION Ares Diversified Credit A	CADEX	Bank Loan
Eaton Vance Floating-Rt Opports I	FROIX	Bank Loan
Ecofin Tax-Exempt Private Credit, Instl	TSIFX	High Yield Muni
First Eagle Credit Opportunities I	FECRX	Bank Loan
Flat Rock Core Income	CORFX	Bank Loan
Flat Rock Enhanced Income Fund	FRBBX	Bank Loan
Flat Rock Opportunity USD	FROPX	Moderate Allocation
FS Credit Income I	FCRIX	Nontraditional Bond
Invesco Dynamic Credit Opportunity AX	XAXCX	Bank Loan
KKR Credit Opportunities I	KCOPX	Bank Loan
Lord Abbett Floating Rate High Income I	LFHIX	Bank Loan
MainStay MacKay Municipal Income Opps I	MMIOX	Muni National Interm
Monachil Credit Income I	MONIX	Bank Loan
NexPoint Real Estate Strategies Z	NRSZX	Real Estate
Nuveen Enhanced High Yield Mncpl Bd I	NMSSX	High Yield Muni
Oaktree Diversified Income Fund Inc D	ODIDX	Intermediate Core-Plus Bond
Opportunistic Credit Interval I	SOFIX	Nontraditional Bond
PGIM Credit Income Z	PGIWX	Multisector Bond
PIMCO California Flexible Mpl In Instl	CAFLX	Muni California Intermediate
PIMCO Flexible Credit Income Inst	PFLEX	Multisector Bond
PIMCO Flexible Emerging Mkt Inc Instl	EMFLX	Emerging Markets Bond
PIMCO Flexible Municipal Income Ins	PMFLX	Muni National Interm
Polen Credit Opportunities Institutional	PCOFX	High Yield Bond
Redwood Real Estate Income Fund	CREMX	Real Estate
Variant Alternative Income Institutional	NICHX	Multistrategy
Variant Impact Fund Institutional	IMPCX	Ultrashort Bond
Voya Credit Income A	XSIAX	Bank Loan

Source: Fund company filings. Data as of May 31, 2024.

The third dynamic is that some interval funds charge performance fees, which will be familiar to investors coming from the private world but rare for average investors. Performance fees can be a positive incentive when structured properly, but they can also enable perverse incentives that are damaging to shareholders, such as in the case of the recently registered Booster Income Opportunities Fund. Morningstar's Jeff Ptak noted that, according to the filing, it receives 100% of income exceeding 7% per year up to 8.24% and then 15% of any income greater than 8.24%.[13] Only a handful of interval funds charge performance fees, but that list is likely to grow alongside the market.

13 For additional color, see our colleague Jeff Ptak's recent X (formerly Twitter) thread here: https://twitter.com/syouth1/status/1796287644902543399

Complexity and Transparency

Although the 1940 Investment Act ensures a level of transparency that sets interval funds apart from private equity and credit funds, interval funds are still complex investment structures that may be difficult for the average investor or advisor to navigate.

One aspect is the investment strategy and underlying assets, especially regarding the current wave of interval funds that invest in the equity or debt of private companies or private funds. These investments often come with future capital commitments that, for example, make it difficult to know if an interval fund's 10% in cash is truly available as cash or is earmarked for a future commitment that could come at any time.[14]

The Schedule of Investments can be difficult to understand, especially if many holdings are private funds. Returning to Bow River Capital Evergreen Fund, the difference between "Primary Funds" and "Private Investment Funds"[15] may not be clear to many, nor will the differences between TKO Fund and ONEX Fund V. Adding additional disclosure to the Schedule of Investments would be helpful, such as the underlying asset class(es) a private fund is invested in, the expected maturity of that holding, its cost to the interval fund, expected future capital commitments, and so on.

Another area where transparency could be better is the frequency and quality of disclosures about withdrawal activity from prior repurchase offers. For each redemption offer, investors deserve to know how many shares were requested by fellow investors and how many were ultimately repurchased by the fund relative to the number outstanding when the transactions occurred. At present, interval funds typically disclose some but not all of this information in a section called either "Repurchase Offers" or "Capital Share Transactions" in annual and semiannual reports. It is standard to disclose the number of shares repurchased, but not the number of shares outstanding at that time, or the percentage of outstanding shares repurchased, which makes it difficult to determine the magnitude of repurchase activity. Improving the frequency and quality of such disclosures would help investors and regulators gauge how much outflow pressure an interval fund may or may not be under.

At least in this case, all interval funds should follow the lead of the Wildermuth Fund, for example. Its March 2023 annual report clearly discloses the amount offered for repurchase, the amount tendered by shareholders, and the amount actually repurchased, each in both percentage terms and number of shares. The data in the table below was taken from that annual report and reformatted for ease of reading.

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14 When a limited partner (like an interval fund) invests in a private equity fund or similar structure, their capital is not invested all at once. Rather, when the private equity fund's general partner is ready to make an investment, it will call (or "draw down") the limited partner's committed capital. Sometimes these capital calls can come at inopportune time for limited partners.

15 "Primary Funds" typically make direct investments in private companies, while "Private Investment Funds" is an umbrella term that can include secondary funds, coinvestment funds, and funds of funds.

Exhibit 11 Wildermuth Fund Withdrawal Activity and Repurchase Offer Disclosure

Repurchase Pricing Date	29-Apr-22	29-Jul-22	31-Oct-22	31-Jan-22
% of Shares Offered—Total Fund	5.00%	5.00%	5.00%	5.00%
Number of Shares Offered—Total Fund	520,633	496,811	473,746	461,143
% of Shares Tendered—Total Fund	27.36%	27.88%	32.77%	38.44%
Total Number of Shares Tendered—Classes A, C, I	2,851,480	2,770,312	3,105,272	3,544,666
% of Shares Repurchased—Total Fund	5.00%*	5.00%*	5.00%*	5.00%*
Total Number of Shares Repurchased—Classes A, C, I	520,633	496,811	473,746	461,143

Source: March 2023 Wildermuth Fund Annual Report; authors' calculation. Data as of March 31, 2023.
* Repurchases were made on a pro-rata basis.

Smooth Pricing

There is an inherent tension between the daily pricing of interval fund shares and assessing the value of the underlying assets. Because investors can buy an interval fund every business day, the fund must update its net asset value at the same cadence. But the underlying assets, if they are illiquid, won't be priced as frequently, or at least not priced based on trading activity or other observable data. So, the fund's NAV will change to a lesser degree than it would if the market revalued these assets through at least one trade each day. That, in turn, creates a mirage of low volatility and can lull investors into thinking relative NAV stability means relative safety. In the context of private equity funds, AQR's Cliff Asness has called this phenomenon "volatility laundering," but it is applicable to interval funds as well.[16]

Although modern portfolio theory and much of the financial world relies on volatility (usually as measured by standard deviation) of asset price changes as a proxy for risk, that tool can become misleading when assets are repriced infrequently and without many market-sensitive inputs. A very illiquid asset with considerable intrinsic credit risk and very low volatility, for example, will generate extremely strong "risk-adjusted" measures such as Sharpe ratios or the like. Suffice it to say, that kind of result can be extremely misleading. In fact, investment markets are littered with examples of sectors that wooed investors with high risk-adjusted returns for years, only to come crashing down when a crisis of one kind or another produced punishing losses over relatively short periods. Illiquid assets inside interval funds can carry a great deal of risk. Indeed, when less-liquid assets are put into daily NAV wrappers, lower volatility (standard deviation) is often an indicator of higher risk.

On the other hand, the 2023 Mind the Gap study found that mutual funds and ETFs with the lowest volatility experienced the narrowest gap between investor returns and total returns. It therefore might be reasonable to expect interval fund investors to demonstrate better behavior, and not just because they're being forced to. But the tension between pricing at the interval fund level and underlying asset level is a reality that responsible investors shouldn't ignore.

16 Asness, C. 2023. "Why Does Private Equity Get to Play Make-Believe With Prices?" Jan. 6, 2023. Institutional Investor. https://www.institutionalinvestor.com/article/2bstqfcskz9o72ospzlds/opinion/why-does-private-equity-get-to-play-make-believe-with-prices

Conclusion

Interval funds put investment strategies and assets that were historically the purview of institutions and high-net-worth investors within reach of the broader investing public. They are appealing for investors who do not need access to their capital for a long time and who would benefit from exposure to the plethora of asset classes, many of them illiquid, that interval funds tend to specialize in. Because they offer shareholders periodic liquidity, interval funds seem to work best with assets that generate regular income or can be sold in weeks or months, such as loans and structured credit, rather than assets with even less liquidity, such as private equity. Meanwhile, their status as a 1940-Act investment vehicle means investors enjoy the same protections, disclosures, and tax treatment as they do with mutual funds and ETFs, albeit at a higher cost.

Still, the illiquid nature of interval funds themselves—it can take years to fully withdraw your money from one—should be considered carefully. Investors must have the means and circumstances to accept long holding periods in the first place. There is also a question of the degree to which the complexity of interval funds will enhance long-term portfolio returns. Less-liquid assets such as private credit and private equity are still credit and equity—they will perform poorly in the same kind of market as high-yield bonds or small-cap equity. If all an investor is looking for is amplified return, then it might be best to stick with funds focused on public securities that charge low fees. The decision to own an interval fund should be based on well-articulated reasons, such as their contribution to retirement income or as an uncorrelated asset that improves an investor’s total wealth. Most investors, however, can succeed in achieving their financial goals without recourse to this investment vehicle, its attractive features notwithstanding.

Corrections and Clarifications

On Page 1, a previous version of this paper incorrectly noted the growth of interval funds' assets under management as through April 2024; the actual end date was May 2024.

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