

Item 1 - Cover Page

RADIANT MANAGEMENT, LLC

CRD: 299473

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This brochure provides information about the qualifications and business practices of Radiant Management. If you have any questions about the contents of this brochure, please contact us at (949) 633 6491 or bryce@radiantmgmt.com. 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 about Radiant Management also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Material Changes

No material changes exist as this would be a first of operations.

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Item 4 - Advisory Business

A. General Description

Radiant Management, LLC henceforth to be listed as “Radiant”, was formed in 2018 and offers market timing services. Radiant is principally owned and operated by Bryce Gilleland.

Radiant maintains a Business Continuity Plan that identifies procedures relating to an emergency or significant business disruption. This ensures that clients funds are well managed in the case of an emergency or death of Radiant Management.

B. Summary of Investment Services

Market Timing Signal

Radiant offers a market timing service to our clients that utilizes algorithmic trading methodologies and market research. This method calculates potential market outcomes over the short and medium term and when the model predicts a potential gain for positive trade for customers the model is checked by management and then a trade signal is sent to customers. The model is based on sound market timing principles, but cannot predict the future.

This trade signal sent to clients will be to purchase or sell assets. By partnering with us clients agree to enable an electronic channel between our trade signal and their account by which trade signals are sent to their account. Radiant does not have control of client funds, only the ability to send trade signals. Once sent to an account the trade signal will automatically execute a trade on the customers accounts as long as the customer maintains the API connection.

Radiant does not have access to client funds for withdrawal or transfer purposes.

Potential conflicts:

- a. a conflict exists between the interests of the investment adviser and the interests of the client,
- b. the client is under no obligation to act upon the investment adviser's recommendation and can disable the API and account connection at any time, and

c. if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser.

Material conflicts of interest have been disclosed.

C. Tailored Services and Investment Restrictions

Radiant does not offer tailored services to clients. Radiant utilizes market timing signals and sends the same trade signals to all clients. Given Radiant uses a high risk trading strategy Radiant ensures all clients are made aware of this strategy. Radiant provides fair and equal treatment, and services, to all clients.

D. Wrap fee programs

Radiant does not operate any wrap fee programs.

E. Discretionary and Nondiscretionary Assets

Radiant sends trade signals to customer accounts that will initiate a trade automatically. Through the use of this trade signal Radiant has discretionary authority over a customers' funds.

Item 5 - Fees and Compensation

For non-qualified customers Radiant charges a 1.25% assets under management fee. These fees are assessed on a quarterly basis by Radiant. Radiant will send an invoice to customers to pay these fees at that point in time as the funds are in the customers' account and Radiant does not have access to customer funds. Radiant accepts payment in the form of Bitcoin, Ethereum, U.S. Dollars wire transfer, or ACH/check.

Qualified Investors may choose a performance based fee option or an assets under management option. They will only be charged using one manner. All qualified clients using a performance based fee pay a 20% incentive fee to Radiant for any gains realized by their accounts due to trade signals from Radiant. All qualified customers selecting an assets under management model are charged a 1.25% assets under management fee. Both performance and assets under management fees are assessed on a quarterly basis. Radiant will send an invoice to customers to pay these fees on a quarterly basis. As Radiant does not have access to a customers' funds directly Radiant uses invoicing.

Examples of Fee calculations for the assets under management model are detailed in charts below.

If deposits or withdrawals occur at the quarter mark (e.g. no proration)

| | With deposit | With withdrawal | No deposit or withdrawal |
|---|---|--|--------------------------|
| Starting Quarterly Value | \$10,000 | \$10,000 | \$10,000 |
| Deposits or Withdrawals | \$5,000 | (\$5,000) | \$0 |
| Gains/Losses | \$2,500 | \$2,500 | \$2,500 |
| Ending Quarterly Value | \$17,500 | \$7,500 | \$12,500 |
| Adjusted Ending Value (subtract deposits, add withdrawals) | \$12,500 (\$17,500 minus the \$5,000 deposit) | \$12,500 (\$7,500 plus the \$5,000 withdrawal) | \$12,500 |
| Total Assets Under Management to be assessed fee of 1.25% | \$12,500 | \$12,500 | \$12,500 |
| Fee of 1.25% | \$156.25 | \$156.25 | \$156.25 |

If deposits or withdrawals occur at 1/3 of the quarter, e.g. ~67% proration for fees.

| | With deposit | With withdrawal | No deposit or withdrawal |
|---|--|--|--------------------------|
| Starting Quarterly Value | \$10,000 | \$10,000 | \$10,000 |
| Deposits or Withdrawals | \$5,000 | (\$5,000) | \$0 |
| Gains/Losses | \$2,500 | \$2,500 | \$2,500 |
| Ending Quarterly Value | \$17,500 | \$7,500 | \$12,500 |
| Adjusted Ending Value | \$12,500 | \$12,500 | \$12,500 |
| Prorated deposits or withdrawals | Add \$3,333.33 due to deposit. This is ~67% of the deposit in as it was in the account for ~67%, or 2/3, of the quarter. | Subtract \$1,666.67 for the withdrawal. This removes ~67% of the withdrawal as it was out of the account for ~67%, or 2/3, of the quarter) | |
| Total Assets Under Management to be assessed fee of 1.25% | \$15,833.33 | \$10,833.33 | \$12,500.00 |
| Fee of 1.25% | \$197.92 | \$135.42 | \$156.25 |

Performance based fees use a simple model of 20% of gains. See Chart

Below for Example.

| | With deposit | With withdrawal | No deposit or withdrawal |
|--|---|---------------------------|--------------------------|
| Starting Quarterly Value | \$10,000 | \$10,000 | \$10,000 |
| Deposits or Withdrawals | +\$5,000 | -\$5,000 | \$0 |
| Ending Quarterly Value | \$17,500 | \$7,500 | \$12,500 |
| Adjusted Ending Value (subtract deposits, add withdrawals) | \$12,500 (\$17,500 minus the \$5,000 deposit) | \$12,500 | \$12,500 |
| Total Gains (Ending value - starting quarterly value) | \$2,500 (\$12,500 minus the \$10,000 starting value) | \$2,500 | \$2,500 |
| Incentive Fee to Radiant | \$500 (20% of \$2,500) | \$500 (20% of \$2,500) | \$500 |
| New High Water Mark | \$17,000 | \$7,000 | \$12,000 |

For both qualified and non-qualified clients lower fees for comparable services may be available.

As Radiant does not collect fees in advance and all payments to Radiant are final Radiant has a no-refund policy. However, pursuant to California Code of Regulation, Section 260.235.4(c), clients are entitled to a full refund should termination of the contract occur within five (5) business days.

In the case that a client overpaid an invoice Radiant would rebate the overpayment amount. For example, if the customer is invoiced for \$15,000 and they pay \$20,000, Radiant would refund the \$5,000 overpayment.

Radiant does not receive direct compensation for the purchasing or selling of any assets. Customers are responsible for paying all trade related fees related to their brokerage accounts. Radiant's only form of revenues is through fees paid by customers directly to Radiant. Radiant does not receive a portion of any additional fees incurred by clients.

Performance-based fees will only be charged in accordance with the provisions of CCR Section 260.234.

E. Radiant, and any supervised person at Radiant, does not receive compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. Radiant authorizes its market timing signal on two compensation methods, assets under management and performance fees. Performance fees are only available to qualified investors.

Item 6 - Performance-Based Fees

Radiant provides the option to “qualified clients” to use a 20% performance fee instead of an administrative fee. This is determined when the client signs on with Radiant. Qualified clients must meet the requirement of a net worth of at least \$2,100,000.

All non-qualified clients may not use a performance based fee option.

Item 7 - Types of Clients

Radiant serves individuals.

Radiant has a starting minimum account size of \$5,000.

As of February 2019 Radiant will only work with clients who have accounts on Coinbase (www.coinbase.com).

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

Radiant uses an algorithmic trading methodologies and market research. This looks at charting, fundamental, technical, and cyclical analysis methods, in addition to market research. Making trades based on these methods involves risk of loss that clients should be prepared to bear.

B. Trading Risks

Through our use of targeted trades we seek to minimize downside risk, while capturing upside gains. However, technical analysis trading is a highly volatile and risky endeavor. The method of technical analysis that we use involves recommending trades with large portions of a clients' portfolio that are connected to the Radiant trade signal. Given the risks associated with this style of investing Radiant does not recommend customers have a high portion of their overall net worth with Radiant.

Radiant typically recommends no more than 25% of a customers' portfolio to be allocated to Radiant, and often no more than 5% or 10%. The trade methodology Radiant uses may recommend up to 100% of the funds in the account linked to Radiant to be activated in a given trade. These funds may see large swings in value in short periods of time as the market may be volatile. Radiant utilizes its current methodology to calculate a probabilistic perspective of best risk-reward trades.

In an attempt to minimize risk Radiant offers over a decade of trading experience and six years in the Blockchain space. We find opportunities in the market using a three-prong advanced trading technique:

- Advanced Technical Analysis
- Market sentiment surveys
- Technology development analysis and timelines

C. Types of assets traded

Typically Radiant sends trade signals regarding Bitcoin, and Ethereum, though Radiant are available to trade any asset listed on Coinbase. These are highly volatile assets and as such value can appreciate or depreciate rapidly in these sectors. Though Radiant does not buy and hold for extended periods of time, this risk is prevalent nonetheless.

The market for digital currencies has seen many growth and shrinkage phases on much shorter timelines than the typical market. These cycles

often occur every other year or for two-year periods. These cycles are highly unpredictable and may result in significant value creation or value destruction in short periods of time. As such trades made based on the above methods in this specific market of digital currency involve risk of loss that clients should be prepared to bear.

Other Risks

- a. **Digital Currency Wallet Custodian Risk:** Digital Currencies may be stored on hot and cold wallets on and off Digital Currency Exchanges. While unlikely due to the high level of security of selected wallets, Digital Currencies could be hacked from those wallets. A 2 factor-authentication mechanism is used to mitigate any hacking risk.
- b. **Digital Currency Wallet Transfer Risk:** During the transfer of Digital Currencies between wallets, the withdrawal address might be wrongly input. As Digital Currency transactions are irreversible, Digital Currencies would be sent to a wrong address and non-recoverable. The controlled withdrawal process will be used to mitigate this risk, this ensures the matching of deposit and withdrawal Digital Currency Exchange addresses.
- c. **Digital Currency Lending Risk:** As with any extensions of credit, there are risks of delay and recovery. Should the borrower of Digital Currency fail financially or default in any of its obligations under any Digital Currency lending transaction, the collateral will be called upon. The value of the collateral will be maintained to exceed the value of the Digital Currency transferred. In the event of a sudden market movement there is a risk that the value of the collateral may fall below the value of the Digital Currency transferred.
- d. **Counterparty Risks:** Keeping assets on Digital Currency Exchange is a counterparty risk. The value of your assets may be affected or lost by the default of digital currency exchanges. A thorough due diligence of Digital Currency exchanges and diversification across multiple exchanges is necessary to mitigate this risk.
- e. **Political and/or Regulatory Risks:** The value of digital currency assets may be affected by uncertainties such as international political developments, change in government policies, changes in taxation, restriction on foreign investment and currency repatriation, currency fluctuations and other developments in the laws and regulations of countries in which investment may be made. Furthermore, the legal infrastructure and accounting, auditing and reporting standards in certain countries in which investment may be made may not provide the same degree of investor protection or information to Investors as would generally apply in major financial markets.

f. **Foreign Exchange/Currency Risk:** The Net Asset Value of the digital assets as expressed will fluctuate in accordance with the changes in the foreign exchange rate between the Base Currencies, USD and BTC. Asset value may, therefore, be exposed to a foreign exchange/currency risk. Where hedging of these currency risks is not undertaken, the performance of asset may be strongly influenced by movements in foreign exchange rates because currency positions held by The Client may not correspond with the assets positions held.

g. **Market Risk:** Some of the Digital Currency Exchanges in which Radiant Management may trade may prove to be illiquid, have insufficient liquidity or be highly volatile. This may affect the price at which The Client may liquidate positions to meet redemption requests or other funding requirements.

h. **Liquidity Risk:** The Client may encounter difficulties in disposing of Digital Currencies at their fair price due to adverse market conditions leading to limited liquidity or change of withdrawal policy from Digital Currency Exchanges.

Item 9 - Disciplinary Information

Radiant follows all legal rules and obligations. Radiant focuses on the safety and security of customers' funds and therefore maintains that Radiant does not have access to customer funds.

Radiant has no prior disciplinary information.

This includes (per legal disclosure requirements)

- No criminal or civil action in a domestic, foreign or military court.
- No proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority.
- No self-regulatory organization proceeding.

Item 10 - Other Financial Industry Activities and Affiliations

- A. Radiant is not currently registered nor is applying to register as a broker-dealer. As this is Radiant's first year of operation Radiant is pending approval as a Financial Advisor firm. Bryce Gilleland is pending review as an Independent Financial Advisor pending passing of the Series 65 exam.
- B. Radiant is not registered nor is applying to register as a futures commission merchant, commodity pool operator, commodity trading advisor, or associated person.
- C. Radiant does not partner with external organizations for research or other financial activities.

Managing funds for investors who pay assets under management fees as well as performance fees may create conflicts of interest. In this manner it is possible there is a conflict to favor the accounts of those paying performance fees. The code of ethics Radiant follows is in place to mitigate this occurrence. To further reduce conflicts of interest Radiant also has structured its proprietary software to disable any customer favoritism. Regardless of customer account size, fee structure, or any other factor. All customers receive the same treatment. Radiant has these practices in place to mitigate conflicts of interest.

Radiant does not have any other partnerships with accountants, bankers, broker-dealers, investment companies, or any other organizations.

- D. Radiant does not recommend or select other investments advisers for our clients.

Radiant does not receive compensation from any partners.

Item 11 - Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

- A. Radiant believes ethics are paramount to prudent business and especially important when one's business is related to advising others on their financial livelihood. Radiant asks that its employees always maintain upstanding ethics. Radiant maintains a code of ethics. Upon request any customer may be given a copy of Radiant's Code of Ethics.

Radiant also abides by the recommended elements provided by the SEC in their code of ethics documentation. These include:

- Prior written approval before access persons can place a personal securities or commodities transaction ("pre-clearance").
- "Blackout periods" when client securities trades are being placed or recommendations are being made and access persons are not permitted to place personal securities or commodities transactions.
- Reminders that investment opportunities must be offered first to clients before the adviser or its employees may act on them, and procedures to implement this principle.
- Prohibitions or restrictions on "short-swing" trading and market timing except as signaled through Radiant market timing signal.
- Requirements to trade only through certain brokers, or limitations on the number of brokerage accounts permitted.
- Through data collection tools the adviser is provided with duplicate trade confirmations and account statements.

- B. Radiant does not recommend outside investors, securities, or has any related financial interests outside of the market timing signal Radiant sends to customers.

- C. Radiant allows its employees to participate in the same market timing signal that it uses with its customers. This creates a potential conflict of interest of between an employees assets and a customers' assets. To minimize this conflict of interest Radiant follows all ethical procedures and, as described earlier, all participants receive the same treatment as this is programmed into the software. Radiant is currently solely owned and operated by Bryce Gilleland.

- D. Radiant allows its employees to participate in the same market timing signal that it uses with its customers. This creates a potential conflict of interest of between an employees assets and a customers' assets. To minimize this conflict of interest Radiant follows all ethical procedures and, as described earlier, all participants receive the

some treatment as this is programmed into the software. Radiant is currently solely owned and operated by Bryce Gilleland.

Item 12 - Brokerage Practices

Radiant's model is such that we have a market timing signal that is sent to a customers' account from which a trade can then be executed. Radiant does not have partnerships with any Broker-dealers. Radiant's communication channel only works with Coinbase. Radiant does not have a contract or relationship with Coinbase. The API functionality that enables trade signals to be sent is what allows Radiant to send these market timing signals.

In determining which brokerage to enable our software to connect with Radiant looks at fee structure, security protocols, regulatory compliance, API applicability, and customer convenience. Based on these factors Radiant will only provide its market timing signals to customers using Coinbase Pro. Radiant receives no compensation from Coinbase.

A. Radiant does not have specific partnerships with any broker-dealers.

Radiant is independently owned and operated and is not affiliated with any Brokerages.

1. Research and other Soft Benefits. Radiant does not receive any research or soft benefit materials.
 - a. Radiant does not receive and therefore cannot use client brokerage commissions to obtain research.
 - b. If Radiant selected brokerages to pay for services Radiant may have an incentive to select or recommend broker-dealers based on an interest in receiving research or other products.
 - c. As Radiant has no contracts with Broker-dealers Radiant cannot ask clients to pay more in commissions.
 - d. Radiant does not receive soft dollar benefits.
 - e. Radiant has not received any products or services with client brokerage commissions and receives no clients from brokerage commissions.
 - f. Radiant did not operate last year and is looking to begin operations. Radiant does not have contracts with nor receives soft benefits from brokers.
2. Brokerage for Client Referrals. Radiant does not receive any fees for Client referrals.

- A. If Radiant partnered with Broker-dealers there may be possible scenarios where Radiant could receive benefit from selecting a particular broker-dealer. However, Radiant does not operate in a manner where we partner with Broker-dealers and therefore do not receive any external compensation, and therefore does not favor any broker-dealer based on a potential for referral fees.
- B. Radiant does not partner with Brokerages for client referrals.
- 3. Directed Brokerage. Radiant does not partner with Brokerages.
 - a. Not all advisers recommend or require that their customers utilize a specific Broker. Radiant does not have any contractual or financial relations with Brokerages.
 - b. Clients of Radiant cannot direct brokerage. Radiant does not partner with Brokerages..
- B. Radiant does not aggregate the purchase or sale of securities for various client accounts as our model of operation is such that we send a trade signal to a customers' account. That trade then executes on that customers' account. By its nature this makes it impossible to aggregate orders. Additionally, Radiant does not partner with Brokerages and therefore could not aggregate orders.

It must be noted that the Department's internal policy related to disclosure of the broker-dealer and/or custodian to be used by the Applicant is noted here. Radiant will only communicate with Coinbase.

Radiant only provides recommended trades to a limited set of digital currencies and only via the use of Coinbase Pro. This allows Radiant to recommend precise market entry and exit points in an effort to maximize customer returns and minimize market slippage. Coinbase Pro also features industry leading security protocols, as well as high levels of liquidity. While these factors do not eliminate risk, they reduce client risk of excessive fees, security breaches, or accessibility to trade opportunities. Other brokerages may offer lower fees than Coinbase.

Item 13 - Review of Accounts

- A. Radiant monitors and collects customer account information on a daily basis to review market positions. For payment Radiant reviews

accounts on a quarterly basis to assess fees and provide quarterly updates to customers. Radiant will also have e-mail communication with customers and be available by phone or other text communications. Bryce Gilleland is the individual who reviews client account information.

- B. If a customer has an inquiry Radiant can review their account. Additionally if a legally permitted agency requests information Radiant will review a customers' account.
- C. Radiant plans to communicate to customers on a quarterly basis through email. This update will include account balance, change in account levels, adds or withdrawals, and any other account related balance information. Radiant also can update customers on an as needed basis. Customers also have access to their accounts via their account on Coinbase. Communications with Radiant customers are electronic and generally in email form. For quarterly billing communications include a PDF invoice. However, if a customer would like a hard copy of any communications they can request this from Radiant.

Radiant recommends all clients use two factor authorization to provide increased security to their accounts and funds. Radiant does not have access to, or maintain, customer account information.

Item 14 - Client Referrals and Other Compensation

A. External Investment Advice or Advisory Services

Radiant does not have any arrangement, oral or in writing, where-in it is paid cash by or receives some economic benefit from a non-client in connection with giving advice to clients. Radiant is compensated 100% on the value of client accounts. Radiant does not compensate any person, directly or indirectly, for client referrals.

A. Solicitors

Radiant does not work with external solicitors in obtaining new clients.

If in the future Radiant will use client referral or other compensation structures Radiant will follow all appropriate laws. Accordingly, any compensated person and/or firm must be properly registered as a

Solicitor pursuant to California Code of Regulation, Section 260.236(c)(2) and Section 260.236.1.

Item 15 - Custody

Radiant is not a custodian, nor does Radiant have custody of client assets. Radiant works with 3rd party custodians. Custodians are defined as a financial institution responsible for safeguarding a firm's or individual's financial assets and is not engaged in "traditional" commercial or consumer/retail banking. Radiant does not hold any client assets. At this time Radiant only works with clients who use Coinbase. Coinbase is therefore the custodian.

Clients should receive account statements from Coinbase and should carefully review such statements.

Clients will also receive account statements from Radiant as Radiant will monitor the accounts to which we have an API link. This link is referred to in the Client Services Agreement.

Radiant recommends that clients compare the account statements they receive from Coinbase with the account statements provided by Radiant.

Item 16 - Investment Discretion

Radiant offers discretionary authority to manage digital currency trading on behalf of clients. In working with our clients they provide an Application Programming Interface (API) that allows us to send trade signals to their account. The funds are maintained in the customers' account and Radiant does not have access to the funds, though Radiant has discretionary authority.

In sending Radiant the API information the client selects the ability for Radiant to receive information regarding account balances and send and receive trade signals. The client does not not allow Radiant to transfer funds. This is explained to the client in discussing a potential partnership, in receiving this Brochure, again in the contracting process, and finally in the process of receiving the API information from the client via the Radiant on-boarding process.

Managing funds for investors who pay assets under management fees as well as performance fees may create conflicts of interest. In this manner it is possible there is a conflict to favor the accounts of those paying performance fees. The code of ethics Radiant follows is in place to mitigate this occurrence. To further reduce conflicts of interest Radiant also has structured its proprietary software to disable any customer favoritism. Regardless of customer account size, fee structure, or any other factor all customer receive the same treatment. Radiant has these practices in place to mitigate conflicts of interest.

Radiant's software is agnostic to customer fee structure and all customers receive the same market timing signal at the same time as the API utilizes a singular database to send trade signals to customers. This signal is sent from Radiant's software simultaneously to all customers. This signal is a buy or sell order for a digital currency that will be executed immediately by the customers' account.

Item 17 - Voting Client Securities

Radiant does not manage securities for clients.

- A. Radiant does not have, nor will accept, authority to vote client securities. As Radiant does not hold securities there is no ability for Radiant to vote on a clients behalf.
- B. Radiant does not have authority to vote client securities. Clients will receive proxies directly from their custodians.

Item 18 - Financial Information

- A. Radiant does not have custody of client funds or securities, nor does Radiant require prepayment. Radiant is not required to provide a balance sheet.
- B. Radiant does not have any financial conditions that are likely to impair its ability to meet contractual commitments to clients.
- C. Radiant has not been subject of a bankruptcy.

Item 19 - Requirements for State-Registered Advisers

A. Principal Executive Officers:

Bryce Gilleland is the sole owner and operator of Radiant Management.

Bryce has an economics degree from the University of California, Irvine. Class of 2006. Bryce also has a project management certification from the University of California, Irvine. Bryce is currently a 2020 MBA candidate at the University of California, Berkeley. Bryce is working towards receiving his series 65 certification as of January, 2019.

Bryce has over 12 years of Business Management, Finance, Policy/Regulatory, and Investor Relations experience in the energy sector. Bryce has served in a variety of roles through various Fortune 500 companies.

Wen Hou is a primary researcher for Radiant Management. Wen Hou has over a decade of trading experience. Wen Hou has significant experience in the IT and development world as well, a BS in Electrical Engineering from UCI. Wen has performed much of the process towards a Ph.D. but stopped due to his desire to move into Finance..

B. Bryce is not currently involved in any other businesses. Bryce is primarily engaged in Radiant.

C. For non-qualified clients Radiant does not utilize a performance based fee.

For qualified clients that elect a performance based fee model, Radiant operates using a 20% commission based incentive fee. As this is a performance based fee model Radiant may recommend an investment that carries a higher degree of risk to the client. Radiant clients are informed upon signing up that Radiant's trade methodology is a higher risk methodology.

D. Radiant has never been found to be involved in negative legal issues.

E. Radiant does not have relationships with any issuer of securities.