

# PERRY CAPITAL PARTNERS LLC

## Form ADV Part 2A/Firm Brochure

CRD no. 312808

SEC File no.

100 Jefferson Ave.

Miami Beach, FL 33139

+ 1 847 668 1560

April 15, 2021

This Form ADV Part 2A, our “Brochure”, is required by the Investment Advisers Act of 1940 and is an important document for our prospects and clients. It provides information about us, our qualifications and business practices.

If you have any questions about the contents of this Brochure, please call us at the number above, or e-mail us at [info@perrycapitalmiami.com](mailto:info@perrycapitalmiami.com).

The information in this Brochure has not been approved or verified by the Securities and Exchange Commission ("SEC") or by any state or foreign securities authority.

Additional information about us, including our Form ADV Parts 1 and 2A, is available via the SEC's website, [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) (click the link, select “investment adviser firm” and type in our name or CRD number, which is 312808).

Our registration as an investment adviser does not imply any approval by the SEC of us or our level of skill or training.

**ITEM 2: MATERIAL CHANGES**

This is our initial Brochure, filed with the SEC as we register as an investment adviser.

In future filings, this section of the Brochure will address those material changes that have been added since the most recent delivery to clients and posting of this document on the SEC's public disclosure website ("IAPD"), [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

If you would like a copy of this Brochure, you may download it from IAPD or contact us, details noted above.

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## PERRY CAPITAL ADVISERS LLC

### ITEM 4: ADVISORY BUSINESS

Perry Capital Partners is a Florida LLC formed on January 8, 2021. We are a sole person firm, owned by James L Perry. We are based in Miami Beach, Florida.

We provide non-security-specific, market-driven, macroeconomic market intelligence and analysis ("Research"). We do not engage in any other activity. We offer this to non-U.S. investment advisers that are not SEC registered, where each has a sub-advisory agreement ("Agreement") with us that is customized to their needs. They, in turn, use our Research for their customers with whom we have no relationship. We are remunerated by our clients, not the customers of our clients.

We do not trade or give trading advice. We do not give advice on proxies. We do not have custody of client cash or assets ("Assets"). We do not solicit or take orders to buy or sell securities. We do not recommend how to vote proxies. We are not a broker-dealer. We do not engage in any transactions that require registration or an exemption under the Commodity Exchange Act.

As of April 15, 2021, we have one client. Assets under management, which represents the amount for which our one client uses our research for its underlying customers, is \$926,073,700.

### ITEM 5: FEES AND COMPENSATION

Our clients pay us a fixed fee, which we negotiate with them at our sole discretion.

We invoice our clients three times a year, in arrears, each time for a four-month period. We sent our clients an invoice that is payable and deposit payments in our corporate account.

Similar advisory services are available from other investment advisers for similar or lower fees.

The fees payable to us do not include other fees and expenses that customers of clients, or clients, incur. The fees associated with an SEC registered investment adviser that exercises discretion for its direct clients are not applicable to us.

If a client terminates a mandate during a quarter, we will charge a fee only for that portion of the quarter during which we provided services.

Neither we nor any of our supervised persons accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the purchase or sale of listed or private funds.

### ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not charge a performance fee.

**ITEM 7: TYPES OF CLIENTS**

Our clients are investment managers located outside the United States that manage money for their customers. We do not have any interaction with customers of clients.

**ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS****Investment Approach - Method of Analysis – Strategy**

We provide non-security-specific, market-driven, macroeconomic market intelligence and analysis. We source the information for our weekly research product from virtually every available financial and business news source. They come from publicly available information and private subscription services. This includes newspapers, network & cable news, magazines, independent market research, and Wall Street research. We consider global economic data, financial sector analysis, market pricing and exchange data, as well as all general financial market pricing action. The markets we cover are the bond markets, stock markets, the foreign exchange markets and the commodity markets. We edit and analyze government data, agency data and private sector corporate data. Once a week, we publish a weekly summary and send it to our client. We are not involved with any client-customer contacts, nor do we provide any security-specific recommendations. We are not involved in any decisions to buy, sell or hold.

**Risks**

We do not own or hold securities; we do not trade securities or invest in securities. We are not involved in any market-making securities process. We are research-driven advisory service. The information our client chooses to incorporate into their research and decision-making process is their own. We have no advisory or discretionary investment authority. Our client decides what to do with our product. Any risk associated with investment management are not applicable to us.

**ITEM 9: DISCIPLINARY INFORMATION**

We have nothing to report.

**ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

We are not registered as a broker, a CTA or a CPO. We are not an exempt CTA or CPO.

Mr Perry, our sole owner and principal, is Senior Vice President & Partner at Arbor Research & Trading LLC ("Arbor"), a related person of ours. Mr Perry has no involvement with Arbor Research & Trading UK Limited or the parent of these two companies, Arbor Research Holdings. Mr Perry holds Series 7 and 63 licenses and passed the SIE.

While working full time for us, Mr Perry continues to provide Arbor with macroeconomic reports for Arbor's clients. His activities for Arbor are unrelated to ours. To address the conflict of interest arising from his work with both firms, we require him to devote full working efforts for us and not to use any of our research for Arbor.

**ITEM 11: CODE OF ETHICS, PARTICIPATION/INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

We have a Code of Ethics ("Code") that governs the conflicts of interest that arise from providing services to our clients. This is designed to help ensure we meet our fiduciary obligation to our clients help prevent the misuse of confidential client information, install a "Culture of Compliance" and satisfy the requirements of Advisers Act Rule 204A-1.

An additional benefit of our Code is to help provide a framework for detecting and preventing violations of securities laws. Our Code is distributed to each supervised person at the time of hire, when amended and annually thereafter. We also supplement the Code with compliance training and on-going monitoring of employee activity.

We seek to adhere to the following guidelines.

- *Client interests are paramount* – As a fiduciary, we act in our clients' best interests. In other words, we do not benefit at the expense of clients.
- *Engage in personal investing that is in compliance with our Code* – Access Persons must abide by the Personal Securities Transaction requirements in our Code.
- *Ensure Supervised Persons do not take advantage of their positions* – Supervised Persons must not give or accept investment opportunities, gifts or other gratuities from persons seeking to conduct business with us, or on behalf of a client, unless in compliance with our Gift Policy.
- *Maintain full compliance with applicable rules and regulations* – Employees must abide by the standards set forth in Rule 204A-1 under the Advisers Act and our Code.

Our Code also addresses the following:

- receipt of our Code and an acknowledgment of review and understanding of our Code;
- requirements related to the confidentiality of confidential client information;
- controls on the acceptance of gifts and entertainment - reporting of all gifts and business entertainment and pre-clearance for those above a threshold;
- outside business activities;
- political contributions;
- pre-clearance of certain employee and firm transactions;
- reporting (initial, transactional and quarterly) all personal securities transactions;
- reporting Code violations; and
- on an annual basis, we require all employees to re-certify to our Code, identify members of their household and any account to which they have a beneficial ownership.

A copy of our Code is available upon request.

**ITEM 12: BROKERAGE PRACTICES**

We do not trade.

We do not solicit or accept orders from clients to buy or sell securities.

We develop our own research. We do not have any soft dollar arrangements in accordance with the safe harbor in Section 28(e) of the Securities Exchange Act of 1934.

**ITEM 13: REVIEW OF ACCOUNTS**

We do not have client accounts to review.

**ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

We do not receive an economic benefit (such as sales awards or other prizes) from any third party for providing investment advice or other advisory services to its clients.

We do not have any arrangements with solicitors to refer prospects to us, which are governed by agreements that satisfy the provisions of Rule 206(4)-3 under the Advisers Act – with effect from May 4, 2021, the Marketing Rule

**ITEM 15: CUSTODY**

We do not have custody of client monies and securities.

**ITEM 16: INVESTMENT DISCRETION**

We do not exercise investment discretion.

**ITEM 17: VOTING CLIENT SECURITIES**

We do not vote proxies and we do not advice on proxy voting.

**ITEM 18: FINANCIAL INFORMATION**

We have nothing to report.