

1.

Firm Brochure

(Part 2A of Form ADV)

EDGE FOCUS CAPITAL MANAGEMENT LLC

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Unit #3

Chicago, Illinois 60614

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This brochure provides information about the qualifications and business practices of EDGE FOCUS CAPITAL MANAGEMENT LLC. If you have any questions about the contents of this brochure, please contact us at (312)725-8901 and/or info@edgefocuspartners.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 EDGE FOCUS CAPITAL MANAGEMENT LLC also is available on the SEC's website at www.adviserinfo.sec.gov. The Firm's CRD/IARD number is 309884.

JULY 2021

2. Material Changes

Annual Update

The U.S. Securities and Exchange Commission ("SEC") issued rules in July and August of 2010 requiring advisers to provide a firm brochure written in narrative "plain English" format. The new rules specify mandatory sections and organization. This brochure is prepared in accordance with the SEC's new rules (the "Firm Brochure").

Material Changes

This brochure for Edge Focus Capital Management LLC is being amended to reflect the following material changes since its brochure dated March 2021: change in the firm's legal name reflected on the cover page and under Item 4.

Additional information is available at www.adviserinfo.sec.gov.

To review the Firm information for ADV Part 1 and ADV Part 2:

- Click "Investment Adviser Search" in the left navigation menu and "Enter"
- Select option for Investment Adviser Firm and enter "309884" in the field labeled "Firm IARD/CRD Number"
- ADV Part 1 will be displayed and you may also access ADV Part 2 from here

Full Firm Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure and any supplements thereto, please contact us by phone at (312)725-8901 or by email at info@edgefocuspartners.com.

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Important Information

As used in this Brochure, the words “we,” “our,” and “us” refer to Edge Focus Capital Management LLC and the words “you,” “your,” and “client” refer to you as either a client or prospective client of our firm. These terms are utilized for the reader’s ease of use while reviewing the brochure and are not meant to imply the firm is larger than it actually may be at the time of publication. Also, you may see the term Associate Person throughout this Brochure. As used in this Brochure, our associated persons are our firm’s officers, employees and all individuals providing investment advice on behalf of our firm. The term “advisor” and “adviser” are used interchangeably where accuracy in identification is necessary.

4. **Advisory Business**

Firm Description

Edge Focus Capital Management LLC (the “Firm” or “Edge Focus”) was organized as a Delaware limited liability company in March of 2017 as “Edge Focus Partners LLC” and in July of 2021 underwent a name change. The Firm began operating as an SEC registered investment adviser in August of 2020 to provide portfolio management services to private investment funds and to institutional clients (other than registered investment companies). The Firm’s principals are Elliott Lorenz, Hirak Biswas, Frank Jones and Kevin Hennessy.

The mailing address of the Firm is 1664 N. Orchard Street, Unit #3, Chicago, Illinois 60614.

Types of Firm Services

Portfolio Management Services

We provide portfolio management services on a discretionary basis to institutional clients (other than registered investment companies). In some instances, the investment advice provided may be custom tailored to meet a client’s investment needs and objectives. In other instances, the investment advice may follow a particular pre-defined investment strategy that might not be custom tailored to an individual client.

At the inception of the relationship, we may gather relevant information about each client’s risk tolerance, investment objectives and financial profile and will recommend an initial portfolio to the client. Once the portfolio is constructed, our Firm will provide continuous supervision taking into account changes in market conditions and client circumstances.

As part of our discretionary portfolio management services, we require clients to grant our Firm discretionary authority to manage client accounts. Discretionary authorization will allow our Firm to determine the specific securities and the amount of securities to be purchased or sold for a client’s account without a client’s prior approval to each transaction. Discretionary authority is typically granted by the investment advisory agreement a client signs with our Firm, a power of attorney or trading authorization forms. Clients may limit our discretionary authority (for example, limiting the types of securities that can be purchased for a client’s account) by providing our Firm with a client’s restrictions and guidelines in writing, which must be approved by the Firm.

Private Investment Funds

The Firm offers management services on a discretionary basis to private investment funds. Such management services include serving as manager and investment adviser to such fund(s) and being responsible for the day-to-day management of the fund’s business and operations as well as being responsible for making investment decisions for the fund(s). The Firm is the general partner of and serves as investment adviser to Edge Focus High Yield Fund LP (the “EFHY Fund”), a private investment fund. We may serve as manager/general partner and investment adviser to additional such private pooled investment vehicles in the future.

With respect to a private fund, the Firm manages the fund’s assets based on the specific investment objectives and restrictions of the particular fund, as outlined in each fund’s Offering Memorandum, rather than on the individual needs and objectives of the individual investors in the private funds. More specifically, the Firm manages the business, investment and financial affairs of each fund, which includes but is not limited to identifying and analyzing potential investments and monitoring the development and eventual sale and liquidation of those investments.

The Firm has not limited the types of investments it makes. Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly on an as-needed basis.

Wrap Fee Programs

Our Firm does not offer any wrap fee programs.

Assets Under Management

Regulatory assets under management as of March 1, 2021:

Discretionary	\$	33,648,705
Non-Discretionary	\$	0
Total	\$	33,648,705

5. Fees and Compensation

Portfolio Management

Discretionary Managed Account Fees

The Firm's fee for managed account clients may vary and may be negotiated on a case-by-case basis. However, the Firm generally charges its managed account clients an annual management fee of up to 1% of the portfolio's assets and performance-based fees of up to 10% of the net profit (if any) of the portfolio for any performance period.

In general, fees are billed quarterly in arrears, according to the exact fee schedule established in an Investment Advisory Agreement, where appropriate. The Firm reserves the right to negotiate its fees up or down, based on the size of the client account and other factors.

Lower fees for comparable services may be available from other sources. The Firm gives a client thirty (30) days prior written notice of any increase in fees unless otherwise specified in Investment Advisory Agreement.

Advisory agreements with Edge Focus are also terminable upon thirty (30) days prior written notice. Upon termination, a client will receive a pro rata invoice for advisory fees outstanding from the beginning of the billing period up to the date of termination. The client will also incur brokerage commissions and other transaction costs as part of regular portfolio trading, which commissions and costs are separate from Edge Focus's investment advisory fee. Brokerage practices are discussed in Item 12 of this brochure.

Private Investment Fund Fees

The Firm offers investment management services for a percentage of assets under management. The Firm also charges performance-based fees for qualified clients.

Management fees are negotiated with each fund and may vary by investment class. Management fees are based upon a percentage of a fund's assets under management. Generally speaking, we charge fund clients a management fee of up to 2.5%. The Firm reserves the right to negotiate higher or lower management fees and the fees or to waive such fees entirely. There is no refund provision for the management fee.

Management fees are paid monthly and are based on the assets in the relevant fund client's portfolio(s) at the beginning of every month. Specific management fee and related expense and billing information are outlined in a fund's Offering Memorandum.

Negotiable performance-based fees are also charged depending on a respective client's requirements and qualifications (referred to in Item 6). Generally speaking, we charge fund clients a performance allocation of up to 10% of the net profit (if any) allocated to the capital account or portfolio of each member of the respective fund. Performance-based fees and the conflict associated with such types of fees are discussed in Item 6 below.

Other Costs Involved

Other types of costs may include transaction costs comprised of security trading costs, brokerage or custodian fees, servicing fees as well as margin costs.

In addition to our fees explained above, the EFHY Fund pays certain expenses associated with its investments. These fees include day-to-day administrative and operating expenses of the fund, including audit and legal fees; accounting and tax preparation costs; reporting, filing and custody fees; computer services and software expense; insurance, etc. Other types of costs include transaction costs comprised of security trading costs, brokerage or custodian fees as well as margin costs. Additional details related to these costs are provided in the fund's Offering Memorandum.

6. Performance-Based Fees and Side-By-Side Management

Edge Focus charges performance-based fees with respect to private investment fund(s) it manages which require investors to be "qualified clients" as defined in Rule 205-3 of the Investment Advisers Act. The amount of performance-based fees that the Firm will charge and how they are calculated vary depending on a number of factors. The Firm only considers charging a performance-based fee to clients that meet the minimum qualification requirements prescribed by federal and state laws and regulations. Performance-based fees are billed and payable either monthly, quarterly or annually, depending on the agreement with the client, or as specified in an Offering Memorandum.

Performance-based fees present conflicts of interests such as (i) creating an incentive for investment adviser to make investments that favor one strategy over another or incentivize the adviser to trade more frequently; (ii) creating an incentive for investment advisers to make investments that are more risky or more speculative than might be the case in the absence of a fee based on performance; and (iii) an investment adviser may receive increased compensation with regard to investment gains on assets in a client's account. These conflicts of interest, however, are mitigated by the fact that prior to entering into a relationship, the Firm and the client agree on investment objectives and trading strategies, which are outlined in the fund's Offering Memorandum.

7. Types of Clients

The Firm provides advisory services to private investment funds and institutional clients (other than registered investment companies).

For managed accounts, the Firm generally imposes a minimum account size requirement of \$1,000,000.

An investor in the EFHY Fund and any other private fund sponsored or managed by the Firm is generally be required to be at least an "accredited investor," as defined by SEC Regulation D under the Securities Act of 1933, as amended. Any client for whom a performance fee and/or allocation is charged must be a "qualified client" as such term is defined in Rule 205-3 of the Investment Advisers Act, as amended. The COO of the Firm must approve any client that does not meet the "accredited investor" standard.

The minimum investment in the EFHY Fund is \$100,000, subject to increase, reduction or waiver but in compliance with all applicable rules and regulations. Minimum requirements for initial and subsequent investments are also described in the fund's Offering Memorandum.

Prior to providing management services, clients will be required to enter into one or more written agreements, which set forth the services we provide, the fees to be charged, and other terms and conditions regarding the relationship.

Client relationships vary in scope and length of service.

8. Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Utilizing its principals' background in quantitative finance and algorithmic trading, Edge Focus will apply rigorous data science and machine learning technology in an attempt to create an optimal portfolio of notes that the Edge Focus believes are underpriced based on borrower characteristics. The Fund will invest across notes of varying credit quality, providing clients with a diversified portfolio of risk and returns. Edge Focus also employs risk management techniques to limit exposure across varying credit characteristics, as well as safeguards against technological failures.

More generally, Edge Focus employs both quantitative and discretionary methods to drive returns across its strategies.

Investment Strategies

The EFHY Fund utilizes the Edge Focus High Yield program which is a technology-driven fund which gives investors unique access to the consumer lending market. Marketplace lending loans are originated from online lenders thus disintermediating traditional credit markets. These fintech platforms provide borrowers an alternative to borrow money. They collect data directly from borrowers as well as credit bureaus and then provide this data to potential lenders.

The Edge Focus High Yield program intends to achieve its investment objective by investing in notes issued on such various lending platforms (e.g., Lending Club) ("Loans"). A portfolio may consist of well over 1,000 notes of varying credit quality. Edge Focus may also use margin. Edge Focus typically invests in notes that have 3- and 5-year payback periods. The EFHY Fund will attempt to deploy funds as quickly as possible and maintain minimal cash such as to reduce cash drag (except in the case of withdrawals). Funds not yet deployed are held with Lending Club.

Edge Focus does not set any limit on the types of securities or other instruments in which it may invest; the types of securities or other instruments in which it may take positions; the choice of property types within which it seeks to identify securities; the choice of markets (domestic or foreign) within which it may invest; the types of positions it may take; the investment or trading strategies it may use; its ability to borrow or use other types of leverage; or the concentration of its investments. For example, in the EFHY Fund, Edge Focus as general partner has very wide latitude to invest or trade the EFHY Fund's assets, to pursue any particular strategy or tactic, to cause the portfolio to be concentrated or non-diversified, or to change the EFHY Fund's emphasis, objectives, policies and strategy, all without obtaining the approval of investors.

Investment strategies will vary depending on the objectives and restrictions of the client. For private fund clients such will be outlined in the respective fund's Offering Memorandum.

Risk of Loss

All of Edge Focus's investment strategies have certain risks that are borne by the investor, including the potential risk of a total loss. While Edge Focus's investment strategies constantly seek to keep the

risk of loss in mind, the risks that investors face by investing with the Firm include, without limitation, the following:

Market Risk: The price of a security, bond, or commodity interest may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's or other contract's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

Loan Risk: Loans may be secured or unsecured, unsecured obligations are not backed by any collateral or guaranteed nor are they insured by any third party.

Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (e.g. interest rate). This primarily relates to fixed income securities.

Business Risk: These risks are associated with investing in a particular industry or a particular company within an industry.

Information Risk: While the Firm seeks to employ measures to reduce risk, the Firm may not have access to all the necessary information relating to the Loans in which it invests including borrower information and creditworthiness.

Technology Risk: The Loans are originated through an online platform and this comes with its own risks. For example, borrowers may not view or treat their obligations as having the same significance as loans from traditional lending sources, such as bank loans and Loans may have a higher risk of default than loans of borrowers with similar credit scores to other lenders.

Financial Difficulties of Institutions and Custodians. There is the possibility that institutions, including brokerage firms and banks, with which the Firm and/or its clients do business, or to which securities have been entrusted for custodial purposes, will encounter financial difficulties.

Liquidity Risk: Liquidity is the ability to readily convert an investment into cash.

Considering the Firm's method of analysis and investment strategy, investors should be aware that the investment recommendations are dependent on the Firm's judgment and abilities. All investments and recommendations are made exclusively by the Firm and based on the Firm's reports and analysis. Additionally, as the Firm utilizes proprietary models, trading strategies of the Firm are continually developing and evolving and may be changed without notice to the Firm's clients.

Edge Focus' investment recommendations seek to limit risk. However, our investment strategies will still subject the client to declines in the value of their portfolios, which can at times be dramatic and lengthy, particularly for clients who are aggressively seeking increased expected returns by accepting increased levels of market risks. Therefore, significant losses can occur if the client's trading model is not successful. Regardless of the steps taken to minimize risk, investments in securities and loans remains inherently uncertain especially with respect to future returns. Edge Focus does not represent or guarantee any future results.

The risk factors discussed above are not in any way intended to be an exhaustive listing of all potential risks associated with an investment utilizing Edge Focus's methods of analysis and/or investment strategies. Investors in funds advised by Edge Focus should also review all additional risk factors discussed in the relevant fund's offering documents.

9. Disciplinary Information

The Firm and its principal owner do not have any legal or disciplinary events to disclose.

10. Other Financial Industry Activities and Affiliations

Financial Industry Activities

The Firm does not engage in any financial industry activities outside of its normal advisory business. Furthermore, the Firm has no other active or pending financial industry registrations.

Affiliations

The Firm does not have any arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

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

Code of Ethics

The Firm has established a Code of Ethics that will apply to all of its associated and supervised persons. The Firm has a fiduciary duty to all of its clients which is the core underlying principle for its Code of Ethics. The Firm requires all employees, associated and supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times, including without limitation, the anti-fraud provisions of Rule 204A-1 of the Advisers Act. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand and agree to comply with the Firm's Code of Ethics. The Firm has the responsibility to make sure that the interests of all clients are placed ahead of the Firm's or its supervised person's own investment interest. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to any services being conducted. If a client or a potential client wishes to review the Firm's Code of Ethics in its entirety, a copy will be provided promptly upon request.

Participation or Interest in Client Transactions and Personal Trading

The Firm and its associated persons may buy or sell securities and other investments that are also recommended for clients. The resulting conflict of interest, however, is actively mitigated by the Firm as the Firm (a) prohibits trading in a manner that takes personal advantage of price movements caused by client transactions and (b) in accordance with the Firm's Code of Ethics, the Firm and its associated persons will never be allowed to place their personal interests ahead of those of their clients.

12. Brokerage Practices

Selecting Brokerage Firm

Where applicable, the Firm may suggest brokers or custodians to its clients upon request but clients are free to use any brokerage or custodian services that they wish. However, the Firm considers a number of factors in selecting and/or suggesting brokers and custodians for its clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided.

If applicable, the Firm selects brokers and/or custodians for the private funds it manages and the Firm may change such brokers from time to time.

The Firm does not have any affiliation with any brokerage or product sales firm.

Research and Soft Dollar Benefits

The Firm does not currently receive research or other products or services (“soft dollar benefits”) other than execution from a broker-dealer or a third party in connection with client securities transactions in compliance with SEC rules.

Directed Brokerage and Aggregated Orders

The Firm will not require or engage in directed brokerage involving our clients.

13. Review of Accounts

Periodic and Other Reviews

Reviews of all accounts are performed on a daily basis. More reviews can be necessary due to the client’s circumstances, economic conditions, general factors affecting the stock market, etc.

Regular Reports

The level of reporting will depend on the specific arrangements between the Firm and a respective client. If applicable, clients will receive transaction confirmations and monthly statements from their account custodians.

We may, in our discretion, furnish investors in the private investment funds we manage with periodic written unaudited performance reports on a monthly basis. On an annual basis, investors receive a copy of the relevant fund’s annual audited financial statements and, where applicable, a statement of taxable income (Schedule K-1).

14. Client Referrals and Other Compensation

Client Referrals

The Firm does not directly or indirectly compensate any person for client referrals.

15. Custody

Custody of Client Funds or Assets

Managed Accounts

Edge Focus is generally deemed to have custody of client funds and securities whenever Edge Focus is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Edge Focus will maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody. For accounts in which Edge Focus is deemed to have custody, the Firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client’s name. Clients or an

independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, where applicable, account statements are delivered directly from the qualified custodian and/or an independent representative (e.g., the administrator) to each client, or the client's independent representative, at least quarterly. When clients have questions about their account statements, they should contact Edge Focus, the qualified custodian or the independent representative/administrator preparing the statement. When fees are deducted from an account, Edge Focus is responsible for calculating the fee and delivering instructions to the custodian. At the same time Edge Focus instructs the custodian to deduct fees from the client's account. Edge Focus will send the client an invoice itemizing the fee. Itemization will include the formula used to calculate the fee, the amount of assets under management the fee is based on, and the time period covered by the fee.

Private Investment Funds

Since the Firm is the general partner of the EFHY Fund and may become sponsor of other private funds in the future, Edge Focus is deemed to hold cash or securities for, or on behalf of such funds. All client assets are maintained with third party qualified custodians.

With respect to the Firm's fund clients, the Firm has implemented the following procedures:

- An independent public accountant provides annual audited financial statements for the fund in accordance with generally accepted accounting principles.
- The Firm will distribute audited statements to all members within 120 days of the fund's fiscal year end.
- A qualified custodian maintains cash for the fund in a separate account(s) in the name of the fund and an independent representative (e.g., the administrator) provides account statements at least quarterly to investors where applicable.

The Firm urges investors in the EFHY Fund (and any other fund the Firm may sponsor) to carefully review all of the financial and account statements that they receive.

16. Investment Discretion

Discretionary Authority for Trading

Generally, we have authority to buy and sell securities or other instruments for our clients without specific ongoing client supervision. However, we may be subject to client-imposed limits on the kind or amount of securities to buy or sell. The investors in the private investment funds managed by us generally may not place any limits on our authority beyond the limitations set forth in the offering and governing documents of such private investment funds.

17. Voting Client Securities

Proxy Voting

Managed account clients are expected to vote their own proxies if applicable. The client will receive their proxies directly from the custodian of their account or from a transfer agent. When assistance on voting proxies is requested, the Firm may provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client. The Firm votes proxies for its fund clients. The Firm has its own proxy voting policy. The policy provides that the Firm vote in the best long-term economic interest of its advisory clients and their beneficiaries, considering all relevant factors and without undue influence from individuals or groups who may have an economic interest in the outcome of a

proxy vote. Given the nature of the EFHY Fund investor base, it is highly unlikely we will have a conflict involving proxy voting, e.g., if an investor was an issuer or executive of an issuer that we also own in the fund. In such a circumstance, however, we will adhere to the proxy voting policy. Fund investors may obtain a copy of the proxy voting policy or a record of how proxies for the private fund in which they invested were voted free of charge by calling or writing us at the number or address set forth on Page 1.

For clients subject to ERISA, an authorized plan fiduciary other than the Firm will retain proxy voting authority. Our investment advisory agreement and/or the plan's written documents will usually evidence and outline this authority.

18. Financial Information

Financial Condition

There are no financial conditions which are reasonably likely to impair its ability to meet contractual commitments to clients.

Prepayments

The Firm does not require nor does it solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

Privacy Policy

Privacy Policy Notice

The privacy of the clients of the Firm is a matter of the utmost concern. The Firm does not share or disclose customer information to nonaffiliated third parties except as permitted or required by law and is committed to safeguarding the confidential information of its clients. The Firm holds all personal information provided to clients in the strictest confidence and it is the objective of the Firm to protect the privacy of all clients.

In the event that there is to be a change in this policy, the Firm will provide clients with written notice and clients will be provided an opportunity to direct the Firm as to whether such disclosure is permissible. The Firm delivers a copy of its privacy policy to all clients on an annual basis.

To conduct regular business, the Firm may collect personal information from sources such as:

- Information reported by the client on applications or other forms the client provides to the Firm;
- Information about the client's transactions implemented by others and viewable by the Firm;
- Information developed as part of analyses or investment advisory services.

To administer, manage, service, and provide related services for clients' accounts, it is necessary for the Firm to provide access to customer information within the firm and to nonaffiliated companies with whom the Firm has entered into agreements with. To provide the utmost service, the Firm may disclose the information below regarding customers and former customers, as necessary, to companies to perform certain services on the Firm's behalf.

- Information the Firm receives from the client on applications (name, social security number, address, assets, etc.);
- Information about the client's transactions with the Firm or others (account information, payment history, parties to transactions, etc.);
- Information concerning investment advisory account transactions;
- Information about a client's financial products and services with the Firm.

The Firm maintains the confidentiality of the information that its clients provide. The Firm protects client's information by meeting all laws setting forth procedures for providing physical, electronic, and procedural safeguards that comply with federal regulations to guard clients' nonpublic personal information.

All people who work for the Firm are trained to handle client's information properly in order to maintain its security. The Firm also restricts access to personal information about clients to only those employees who need such information to provide service(s) to the client. The Firm does not sell or market clients' or prospective clients' personal information to third parties. The Firm does not disclose any information about its clients or former clients to anyone, except as needed by our service providers (e.g. broker, accountants, attorneys and auditors) or as required by law.