



VERDEAM

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www.verdeam.com

**Form ADV Part 2A, Firm Brochure
November 2021**

This firm brochure provides information about the qualifications and business practices of Verdeam, LLC. If you have any questions about the contents of this firm brochure, please contact our Chief Compliance Officer, Gregory J. de Rozario (303) 953-5125 or via email at gderozario@verdeam.com. The information in this firm brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Verdeam, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

The CRD number for Verdeam, LLC is **128442**.

While Verdeam, LLC may refer to itself as a Registered Investment Adviser, clients and prospects should be aware that registration itself does not imply any level or skill or training.

Please Retain a Copy of this Brochure for your Records

ITEM 2: MATERIAL CHANGES

Form ADV 2 is divided into two parts: Part 2A and Part 2B. Part 2A (the “Disclosure Brochure”) provides information about a variety of topics relating to an Advisor’s business practices and conflicts of interest. Part 2B (the “Brochure Supplement”) provides information about advisory personnel of Verdeam, LLC.

Verdeam, LLC believes that communication and transparency are the foundation of our relationship and continually strive to provide our Clients with complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

The following changes have been made to this Disclosure Brochure since the last filed and distributed version:

- **Additional ADV Part 2B (Brochure Supplements) have been added for Erik Engelstad and Greg de Rozario**

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by the securities regulators. This complete disclosure brochure or a summary of material changes shall be provided to each client at least annually, or more frequently if a material change occurs in the business practices of Verdeam, LLC.

At any time, you may view the current disclosure brochure online at the SEC’s Investment Adviser Public Disclosure website by visiting www.adviserinfo.sec.gov. (The CRD number for Verdeam, LLC is 128442.) You may also request a copy of this disclosure brochure directly from Verdeam, LLC at any time, by calling (303) 953-5125.

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ITEM 4: ADVISORY BUSINESS

Verdeam, LLC (hereafter “Verdeam”), is a fee-based private investment management firm that focuses on fixed income and real estate investments that offer current income as well as capital appreciation. Verdeam focuses on niche strategies that are not correlated to main stream sectors that provide above market risk adjusted returns.

Verdeam is a registered investment advisory firm, formerly known as Palm Advisors, LLC established in 2003. Verdeam is a subsidiary of VCM LLC, a holding company principally owned by Carl G. de Rozario. Gregory J. de Rozario serves as the firm’s compliance officer.

Investment Management Services

Private funds are neither registered under the Securities Act of 1933, nor registered under the Investment Company Act of 1940. Accordingly, interests in these funds are offered exclusively to investors satisfying the applicable eligibility and suitability requirements either in private placement transactions within the United States or in offshore transactions. Specifically, these funds are only offered to qualified clients and accredited investors. No offer to sell these funds is made by the descriptions in this Brochure, and as noted these funds are available only to investors that are properly qualified.

Private fund investments are managed in accordance with the investment objective set forth in each private fund’s confidential offering memorandum and such investments are not tailored to the individual needs of any particular private fund investor. The accounts are managed in accordance with a client’s (General Partner/Fund) chosen strategy and clients have a limited ability to tailor such strategies or limit certain securities. Investors in these vehicles must meet the qualifications of the investment instrument. These private investment vehicles may not be available to, or appropriate for, all investors. Participation in the vehicles' strategies may involve certain risks and the investments may not be suitable for all investors.

The Adviser will seek to invest in structured cash flows, investing in interest-only strips that are created from Small Business Administration (“SBA”) and United States Department of Agriculture (“USDA”) guaranteed loans. The core strategy of the adviser is to buy and hold the strips while looking for restructuring opportunities. The adviser will also invest in other structured fixed income securities and or derivatives including cash flows (asset-backed receivables) derived from other U.S. Government-Sponsored Enterprises and agencies. These instruments may include, but are not limited to obligations issued by the Federal Agricultural Mortgage Corporation, Government National Mortgage Association, Federal Home Loan Mortgage Corporation and Student Loan Marketing Association.

Verdeam also creates limited partnerships for the purpose of investing in real estate and in particular, manufactured home and multi-family communities and self-storage.

Investment Advisory and Administrative Services

Verdeam supervises the investment management of the cash and securities of an affiliated party's pooled investment vehicle, and to the extent required, provide advice and recommendations on securities to be purchased, held or sold and the portion of the assets to remain uninvested in accordance with the investment objectives, powers and restrictions imposed by law or other governing document or writing binding upon the Fund.

Verdeam shall perform administrative, accounting, analysis and/or valuation services designed to track a wide range of loan characteristics and provide a comparative analysis of the securities for pooled investment vehicles or lending programs, as well as other financial statements and reports, on a yearly, quarterly or monthly basis.

Regulatory **assets under management** at the time this brochure was prepared were:

Discretionary	\$ 47,356,250.00	
Non-Discretionary	0	Total \$ 47,356,250.00

Real Estate Valuation Method

Verdeam recognizes that the value of its real estate holdings will fluctuate depending on market conditions. The valuation method adopted by Verdeam seeks to minimize the gap between the value reported as assets under management and the true market value.

The valuation of each funds underlying portfolio, as of the date of this brochure, is outlined in the table below.

Fund	Total Property Value (1)	Total Property Cash/Receivables (2)	Total AUM (3)
Vertex Master Partnership LLLP	\$14,597,116.67	\$380,021.00	\$14,597,116.67
Verdeam Alternative Income Fund	\$ 7,560,489.28	\$ 50,003.79	\$ 7,560,489.28
VP 2012-1	\$217,384.00	\$0.00	\$217,384.00
Vertex Regency Partners	\$ 14,407,248.27	\$ 1,266,538.11	\$ 14,407,248.27
Lassen Development Partners	\$ 1,000,000.00	\$153,255.00	\$ 1,000,000.00
Platte River Master Partnership	\$9,420,757.02	\$0.00	\$9,420,757.02
Totals:	\$ 47,356,250.00	\$ 1,849,818.00	\$ 47,356,250.00

Total Property Value (column # 1) is the sum of the Community and Home Inventory Valuations. Adjusted net operating income (NOI) is calculated using trailing 6 month revenues over trailing 12 month expenses. That Adjusted NOI is then divided by a CAP rate. The CAP rate is intended to reflect: current market conditions as well as other variables we determine may impact the value of the property. If the property has been held for less than 12 months, equity plus debt raised is used.

Property cash and receivables (column #2) is equal to the total current assets on the Partnership's balance sheet.

The property values (column #1) and the property cash and receivables (column #2) are added to arrive at the total SEC Assets Under Management (column #3).

ITEM 5: FEES AND COMPENSATION

Verdeam's compensation depends upon the manner in which it provides service. We are compensated on various combinations of a percentage of assets under management, assets under advisement, and performance-based fees. Fees may be negotiated or waived in certain circumstances.

The Platte River Master Partnership LLLP and the Verdeam Alternative Income Fund, LLLP continue to raise equity through subsequent subscriptions as new participation comes available through the acquisition of assets and associated lending requirements.

Investment Management Fees

Advisory fees for private funds range from 1.00% to 2.00% annually of client assets under management, calculated monthly on the last day of each month on the ending account balance for the monthly billing period. In some cases, depending on the terms of the fund, the advisory fee shall cease to be payable once Verdeam is eligible to receive an Incentive Fee.

In managing the Private Fund(s), Verdeam may also be entitled to Incentive Fee(s) or Allocation(s); performance-based fees. These fees are in the amount of 10% to 45%, depending on the fund, calculated monthly or quarterly based on the value of the last business day of each month/quarter. Verdeam may waive or lower management or performance fees for certain investors in the private funds because of their affiliation or relationship with Verdeam. Private fund fees are described to investors, in detail, in each private fund's confidential offering memorandum. The funds are only offered to qualified clients and accredited investors.

The Private Funds bear all expenses incidental to their operations and business, including organizational, investment and operating expenses. Investment expense include, but are not limited, to the expenses related to investing and holding capital, such as brokerage commissions, ticket charges, expenses related to short sales, trade execution platforms, clearing and settlement charges, custodial fees, bank service fees, interest expense, and extraordinary expenses. Operating expenses include but are not limited to third party professional and service fees and related expenses, including legal, administrative, consulting, custodial, regulatory reporting (including, but not limited to, Form PF, Schedule 13G, etc.), expenses related to the ongoing offering of Interests (including any "blue sky" filing fees), accounting, software and support, bookkeeping, investment and voting support, investor, auditing and tax preparation, premiums for directors' and officers' liability insurance (if any), indemnification expenses, research expenses such as systems, software, data, pricing feeds, databases, and related computing equipment.

Fees and expenses for each Private Fund are described to investors, in detail, in the appropriate Private Fund's confidential offering memorandum.

Other Expenses

Other expenses for the Private Funds are described in the preceding sections. With respect to other funds and accounts, investment activity may also involve transaction fees payable by client PIVs, such as sales charges, ticket charges, expenses related to short sales, clear and settlement charges, bank service fees, interest expenses, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. In addition, clients will incur certain charges imposed by custodians, broker-dealers, third party investment consultants, and other third parties, such as custodial fees, consulting fees, administrative fees, and transfer agency fees.

We do not accept, and none of our principals, members, managers, directors, officers, and employees (collectively, "supervised persons") accept, any compensation for the purchase or sale of securities.

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

Performance-based fees; fees based on a share of capital gains and or capital appreciation of the assets of a client (such client that is a hedge fund or other pooled investment vehicle). Fees which may be paid to Verdeam or to affiliates of Verdeam that serves as the general partners of the private funds.

This payment may be structured as a fee (referred to as an incentive fee or performance fee) or an allocation (referred to as an incentive allocation or performance allocation). A performance or incentive fee or allocation is representing an asset manager's compensation for managing an account/fund, which is based upon a percentage of the net income and/or profits of the account/fund being managed.

Incentive Allocation

A hedge fund is a partnership. The general partner entity is a partner in the hedge fund partnership, and as such is entitled to an allocation of the partnership's income, profits, losses, and expenses. The partnership agreement generally provides that income, profits, losses, and expenses are first apportioned among the partners in proportion to capital contributions. The incentive allocation provisions of the partnership agreement provide, however, that if there is net income in any year, a % of the **net income** that is initially apportioned to the limited partners will be allocated instead to the general partner (which in turn can be allocated to the advisor). The incentive fee provisions of the partnership agreement provide that if there is net profit in any quarter, the fund pays a fee to the general partner equal to a % of such net profit.

When calculating the net profits, the fees and/or allocations will be based on absolute or **benchmark** (sometimes referred to as a hurdle) relative returns and subject to certain *clauses* or *provisions*. The

hurdle rate indicates the minimum economic performance that the fund adviser must achieve in order to be allowed to charge an incentive fee.

The **high-water mark** (or 'loss carry forward') states that any previous losses must be recouped by new profits before the incentive fee is to be paid. A provision in which the performance fee only applies when there are net profits (i.e., profits after the losses in previous years have been recovered). This means that the Advisor only receives an Incentive Fee on increases in the account value of the Client's account in excess of the highest account value it has previously achieved.

When Platte River Property Management, a Verdeam, LLC subsidiary operates as Property Manager on a Pooled Investment Vehicle, they are entitled to a Property Management fee up to 5% of monthly gross revenues.

Important note regarding performance-based fees: *Performance-based fees create certain inherent conflicts of interest with respect to Verdeam's management of assets. For example, such fees may cause us to engage in transactions or strategies which will increase the amount of the performance fees, but which may not increase the overall performance of the client's account. To minimize this conflict of interest, Verdeam's performance fee is usually earned only when the account performance is positive and account performance exceeds an agreed-upon hurdle rate.*

Specifically, our entitlement to a performance-based fee in managing one or more accounts may create an incentive for us to take risks in managing those assets that we would not otherwise take in the absence of such arrangements, or to recommend an investment that may carry a higher degree of risk to the client. Additionally, since performance-based fees reward us for strong performance in accounts which are subject to such fees, we may have an incentive to favor these accounts over those that have only asset-based fees (i.e., fees based simply on the amount of assets under management in an account) with respect to areas such as trading opportunities, trade allocation, and allocation of new investment opportunities. To minimize this conflict of interest, Verdeam's performance-based fee schedule will usually include a base fee calculated on assets under management so that Verdeam's incentive to grow capital that is appropriately balanced with an incentive to preserve capital.

The conflicts of interests described above are further minimized by the fact that we employ the same investment strategy for all pooled investment vehicles, we only advise private funds which generally will all have a performance fee arrangement.

In addition to the Management Fee(s) (asset-based fee) that Verdeam receives for the management of Private Funds, Verdeam may also receive:

An **Incentive Allocation** based upon any gains obtained in the Client's account/fund for the preceding quarter. This fee will be equal to a % of any gains in the Client account at the end of the preceding quarter, subject to a "**high water mark**" to ensure the Advisor will not receive the Incentive Fee unless, and only to the extent that there are cumulative gains in the Client's account.

An **Incentive Fee** based upon the Client/Fund achieving its **hurdle rate** in which the Limited Partners

receive their Preferred Return (as described in the offering memoranda) and recovering their Capital Contributions. Thereafter, the Incentive Fee, if payable, shall be equal to a % of the Cash Flow (and Net Capital Proceeds, if available) and shall be paid monthly/quarterly as earned.

We structure any performance fees subject to applicable state rules.

ITEM 7: TYPES OF CLIENTS

Verdeam provides investment management and investment advisory services to:

- ***Pooled Investment Vehicles:*** We provide sophisticated investment strategies and techniques to private investment pools.

The minimum suitability standards and investment required to invest in a Private Fund is described in each Private Fund's confidential offering memorandum and is limited to individuals meeting the requirements for "accredited investors" as defined in Rule 501 of Regulation D of the Securities Act of 1933 and "qualified purchasers" defined in Section 2 (a)(51) of the Investment Company Act of 1940.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Verdeam utilizes a proprietary technology to provide analytical and portfolio construction and re-structuring, transforming raw data and complex and forensic analysis into an application to manage both process flow and related data. Our analytical and valuation model is designed to integrate systems for tracking underlying collateral, loans and securities and provide customized reporting to provide real time portfolio pricing, analytics and other specialized portfolio accounting services such as payoff tracking, prepayment analytics, cash flow forecasting and risk control. Despite the analysis we perform, any investment in securities carries market risk and investors may lose their principal investment.

Verdeam's investment strategy is to make investments in undervalued cash flows found in a variety of asset classes including, but not limited to fixed income securities and real estate. To implement our strategies, we analyze, value, and manage fixed income instruments collateralized by various government agencies such as Sallie Mae, the Small Business Administration ("SBA"), other asset backed receivables, and real estate.

Investments in Partnerships/Private Funds involve a number of risks. We invest in a variety of fixed income securities and real estate. Changes in interest rates will affect the underlying loan portfolio. As interest rates fall, borrowers may be compelled to refinance their loan, increasing prepayment risk. As interest rates increase, borrowers may have difficulty making higher debt payments, potentially increasing default risk. Increased interest rate volatility may reduce demand for the assets likely to constitute the fund's portfolios, further reducing liquidity and impacting valuation of the assets in the secondary market negatively. More generally, depressed economic activity may impair the borrowers' core businesses and increase loan defaults. These investment strategies involve a variety of risks and a wide range of assumptions. The risks discussed are not the only risks applicable; a larger scope of risks can be found in each fund's confidential offering memorandum.

Verdeam utilizes a proprietary technology to provide analytical and portfolio construction and re-structuring, transforming raw data and complex and forensic analysis into an application to manage both process flow and related data. Our analytical and valuation model is designed to integrate systems for tracking underlying collateral, loans and securities and provide customized reporting to provide real time portfolio pricing (NAV), analytics and other specialized portfolio accounting services such as payoff tracking, prepayment analytics, cash flow forecasting and risk control.

No investment or investment strategy can assure a profit or avoid a loss. Investing in securities involves risk of loss that clients should be prepared to bear.

ITEM 9: DISCIPLINARY INFORMATION

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the registered investment advisor or the integrity of its management. Neither, Verdeam, its principals, nor its employees have a history of any legal or disciplinary action, and therefore there is nothing to disclose in this regard.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Sponsor of Limited Partnerships

Verdeam Investment Management, LLC is the General Partner of **VP 2012-1, LLLP**. This fund is a Private Fund that is managed by Verdeam, LLC. Both Verdeam Investment Management, LLC and Verdeam, LLC are wholly owned subsidiaries of VCM, LLC in which Carl G. de Rozario, an Officer of Verdeam, is the majority owner. As the investment adviser to this fund, we receive a management fee and subject to certain limitations, may receive performance-based fees as described in Item 5 on page 7 of this Disclosure Brochure.

Vertex Property Holdings, LLC is the General Partner in one of our manufactured housing and multi-family housing investment partnerships.

Platte River Communities, LLC is the General Partner in one of our manufactured housing investment partnerships.

Conflicts of Interest

We and/or our affiliates or related persons will receive management, performance, oversight, board, administrative or similar fees in connection with advisory, management, monitoring, administrative or similar services that we and/or our affiliates or related persons provide to portfolio companies of VCM, LLC. Verdeam employs policies and procedures to address these conflicts of interest as described under Item 11 and 12 below. Such conflicts of interest are further mitigated by the fact that all services provided by Verdeam are structured to include an incentive/performance fee.

Carl de Rozario will be the primary individual serving the management functions of each entity. In

making its decision as to which investment advisor the Partnership would select to manage the Partnership's portfolio, the General Partner had an obvious conflict of interest in selecting its affiliate, Verdeam, LLC, as opposed to one or more independent investment advisors. Potential investors should take note that the entire control of the Partnership and its investments is in the hands of Carl de Rozario, acting through the three entities he controls, and that Carl de Rozario dictated the terms of the Advisory Agreement between Verdeam and the Partnership, including the terms of compensation set forth in the fund's Memorandum.

Fourteeners, LLC is the General Partner of Massive Partners, LLLP. This Private Fund, is managed by Verdeam, LLC. Carl G. de Rozario, an Officer of Verdeam is the majority owner of Fourteeners, LLC, directly and Verdeam, LLC, indirectly.

ITEM 11: CODE OF ETHICS

Pursuant to SEC Rule 204A-1, VERDEAM has a Code of Ethics that promotes the fiduciary duty of Verdeam and its Investment Adviser Representatives and its employees. The Code of Ethics articulates the importance of trust as a foundation to the relationship between an investment adviser and its Clients and establishes policies and procedures to ensure that Verdeam and its investment adviser representatives place the interests of the Clients first. The Code of Ethics requires that Verdeam and its employees adhere to all applicable securities and related laws and regulations. The Code of Ethics also requires Verdeam and its investment adviser representatives follow industry "best practices" involving: confidential information, suitability of investments, personal trading on the part of Verdeam and its investment adviser representatives, outside business activities of investment adviser representatives, and the disclosure of conflicts of interest. A copy of the Adviser's Code of Ethics is available upon request for any Client or prospective Client.

Participation or Interest in Client Transactions and Personal Trading

Individuals associated with Verdeam may make recommendations to client PIVs related to pooled investment funds with which they are associated. In addition, associated individuals are permitted to buy or sell securities for their personal accounts identical to or different than those recommended to clients. Recommendations and transactions such as these may create an incentive for the individual to act in his own best interest rather than accounts identical to or different than those purchased for the pooled investment vehicles. Because affiliates do not invest alongside, there is no avenue to "front run" or disadvantage acquisitions made by the pool. Verdeam prohibits associated persons to favor his or her own interest over that of a client, or to make personal investment decisions based on the investment decisions of clients.

In order to address these and other conflicts of interest, Verdeam requires that associated persons with access to advisory recommendations provide annual securities holdings reports and quarterly transaction reports to the firm's Chief Compliance Officer. Verdeam also requires prior approval from the Chief Compliance Officer for investing in any IPOs or private placements (limited offerings).

ITEM 12: BROKERAGE PRACTICES

Currently, Verdeam does **not** receive research or other products or services other than execution from a broker-dealer or a third-party in connection with client securities transactions ("soft dollar benefits"), as described below. Pooled Investment Vehicles invest in properties, not securities and its portfolios are managed internally by Verdeam affiliates with no relationships to Broker/Dealers or custodians. However, should Verdeam establish a soft dollar arrangement, then Verdeam shall adopt a Soft Dollar Policy to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934.

ITEM 13: REVIEW OF ACCOUNTS

Verdeam reviews each pooled investment vehicle on a monthly basis in conjunction with calculating their management fees. Verdeam utilizes various programs to review investment objectives and strategies. More frequent reviews may be triggered by material changes in variables such as market, political or economic environment.

Pooled fund members are provided with account statements from the fund's general partner on a quarterly basis which includes an NAV summary, an earnings summary for the entire portfolio, individual statements, and cumulative balances. Verdeam will also provide periodic performance analysis.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

Verdeam does not use or employ the services of a solicitor, nor does it compensate an individual or entity for these services. If we were to enter into such an arrangement, we would do so in compliance with applicable law and in accordance with Rule 206(4)-3 under the Investment Advisers or similar state rules regarding solicitation arrangements. Conversely, we do not receive or accept compensation or any other economic benefit from non-advisory clients for providing investment advice or other advisory services.

ITEM 15: CUSTODY

Verdeam does not act as a general partner for a partnership, managing member for a limited liability company or trustee for a trust in which Verdeam's "advisory clients" are either partners of the partnership, members of the limited liability company or beneficiaries of the trust.

We are deemed to have custody of certain client securities under Rule 206(4)-2 under the Investment Advisers Act and similar State Securities and/or other laws and Regulations. Specifically, we are considered to have custody of securities of Private Funds because Affiliates of Verdeam serve as a general partner(s) for a partnership and as a managing member for a limited liability company to Private Funds.

Our funds utilize Gatekeeping services which review the purpose for, and the computation and total

amount of, an requested disbursements by the General Partner from the Fund (each, a “Disbursement Request) and determine the validity of the request in accordance with the Partnership Agreement of the Fund.

Private Fund Investors will receive quarterly statements directly from the third-party administrator if one exists. We urge clients to review their account statements for accuracy.

ITEM 16: INVESTMENT DISCRETION

Generally, our clients retain us on a discretionary basis upon execution of a management agreement. We have discretionary authority with respect to the investment decisions on behalf of our pooled investment vehicles pursuant to the management agreements. Investment decisions for the Funds are made in accordance with the applicable Fund’s investment objectives, strategies and restrictions and are not tailored to the individualized needs of any particular investor in the Fund.

Fund investors should consider whether the applicable fund meets their investment objectives and risk tolerance prior to investing. Information about the Private Funds can be found in their governing documents and offering memoranda.

ITEM 17: FINANCIAL INFORMATION

A balance sheet is not required to be provided because we do not serve as a custodian for any client assets, nor do we require prepayment of fees of more than \$500 six months or more in advance.

ITEM 18: STATE LICENSED ADVISORS

Formal education and business background information for our management persons can be found in Part 2B of Form ADV on pages 18-19 of this document.

Other Business Activities and Financial Activities and Affiliations can be found in Item 10 of Form ADV part 2A on page 12 of this document.

A description of our fee collection structure can be found in items 5 and 6 of this document.



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**Form ADV Part 2B,
Brochure Supplement**

Supervised Person:

Carl G. de Rozario

CRD #: 1224224

Compliance Officer

Greg de Rozario

CRD#:7091572

November 2021

This brochure supplement provides information about the qualifications and background of Carl G. de Rozario which supplements the Verdeam, LLC firm brochure. You should have received a copy of the Verdeam, LLC brochure along with this brochure supplement. If you did not receive the firm brochure, or if you have any questions about the contents of this brochure supplement, please contact our Chief Compliance Officer, Gregory J. de Rozario at (303) 953-5125 or via email at gderozario@verdeam.com.

Additional information about Carl G. de Rozario is available on the SEC's website at www.adviserinfo.sec.gov.

The CRD number for Carl G. de Rozario is **1224224**.

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Education and Business Standards

Verdeam requires the successful acquisition of a college degree, or demonstrated and successful business experience, or combination of both, and requisite continuing education. Related employees of Verdeam may also be required to have examinations based on specific state examination requirements and continuing education requirements.

Carl G. de Rozario was born in 1958, and is the co-founder, managing partner, and Investment Advisor Representative of Verdeam, LLC. Carl graduated with a BS in Economics (with a concentration in Finance) from Colorado State University, in 1983.

Employment History

Prior to forming Palm Advisors, LLC, now Verdeam, LLC, Carl de Rozario was the President and Chief Executive Officer of First Matrix Investment Services, Matrix Capital Markets and Matrix Asset Management.

Carl de Rozario has over 31 years of experience in the securities industry, having specialized in a broad range of mortgage related securitizations.

Carl de Rozario served as Vice President of Structured Finance for U.S. Bancorp Investments where he underwrote asset and mortgage-backed transactions, which included the financing of subordinated whole loan derivatives.

In 1993, Carl de Rozario founded Lewis, de Rozario and Company, a Denver based NASD member broker-dealer, where he served as President and Managing Director of Fixed Income Trading.

Carl de Rozario also served as Vice President of Capital Markets for First Interstate Bank of Denver, where he oversaw all trading activities and managed a \$400 million government bond and mortgaged-back arbitrage trading account.

Disciplinary Information

Carl G. de Rozario has not had any legal or disciplinary events in his past. Clients and prospective clients can view the CRD records (registration records) for Carl de Rozario through the SEC's Investment Adviser Public Disclosure (IAPD) website www.adviserinfo.sec.gov or FINRA's BrokerCheck database online at www.finra.org/brokercheck.

Other Business Activities

Carl G. de Rozario is a direct owner of VCM, LLC which is the parent company of the following:

Verdeam, LLC	Investment Advisor
Verdeam Investment Management, LLC	General Partner
Fourteeners, LLC	

Additional Compensation

Verdeam would be required to disclose additional information if any additional compensation was received from non-clients for advisory services. Presently, no such additional compensation is being received, Verdeam has no information to disclose in this regard.

Supervision

As the Chief Compliance Officer of Verdeam, Gregory J. de Rozario is primarily responsible for the compliance and supervision of Verdeam, LLC and Carl G. De Rozario. As Chief Compliance Officer, Gregory adheres to the policies and procedures described in the firm's Compliance Manual. Advisory clients may contact Gregory J. de Rozario directly by calling (303) 953-5125 or via email at gderozario@verdeam.com.



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**Form ADV Part 2B,
Brochure Supplement**

Supervised Person:

Erik Engelstad

CRD #: 7426415

Compliance Officer

Greg de Rozario

CRD#:7091572

November 2021

This brochure supplement provides information about the qualifications and background of Erik Engelstad which supplements the Verdeam, LLC firm brochure. You should have received a copy of the Verdeam, LLC brochure along with this brochure supplement. If you did not receive the firm brochure, or if you have any questions about the contents of this brochure supplement, please contact our Chief Compliance Officer, Gregory J. de Rozario at (303) 953-5125 or via email at gderozario@verdeam.com.

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Education and Business Standards

Verdeam requires the successful acquisition of a college degree, or demonstrated and successful business experience, or combination of both, and requisite continuing education. Related employees of Verdeam may also be required to have examinations based on specific state examination requirements and continuing education requirements.

Erik Engelstad was born in 1989, and is a Portfolio Manager and Investment Advisor Representative of Verdeam, LLC. Erik graduated with a MBA from the University of Denver, in 2012 with a concentration in Information Technology. Erik graduated with a BSBA in Business Statistics and Operations Management (with a concentration in Finance) from the University of Denver, in 2011.

Employment History

Erik Engelstad serves as a Portfolio Manager for Verdeam, LLC. He also serves as the Director of Information and Technology for Royal Aloha Coffee Company. During the academic year Erik will also serve as an Adjunct Professor at the University of Denver in the Business Analytics and Information Systems department.

Prior to serving as Portfolio Manager for Verdeam, LLC, Erik was the Information systems manager at Verdeam, implementing processes and technology to help Verdeam analysis and preform on its portfolios. Erik Joined Verdeam as an Intern in 2011.

Disciplinary Information

Erik Engelstad has not had any legal or disciplinary events in his past. Clients and prospective clients can view the CRD records (registration records) for Erik Engelstad through the SEC's Investment Adviser Public Disclosure (IAPD) website www.adviserinfo.sec.gov or FINRA's BrokerCheck database online at www.finra.org/brokercheck.

Additional Compensation

Verdeam would be required to disclose additional information if any additional compensation was received from non-clients for advisory services. Presently, no such additional compensation is being received, Verdeam has no information to disclose in this regard.

Supervision

As the Chief Compliance Officer of Verdeam, Gregory J. de Rozario is primarily responsible for the compliance and supervision of Verdeam, LLC and Erik Engelstad. As Chief Compliance Officer, Gregory adheres to the policies and procedures described in the firm's Compliance Manual. Advisory clients may contact Gregory J. de Rozario directly by calling (303) 953-5125 or via email at gderozario@verdeam.com.



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**Form ADV Part 2B,
Brochure Supplement
Compliance Officer
Greg de Rozario
CRD#:7091572**

November 2021

This brochure supplement provides information about the qualifications and background of Greg de Rozario which supplements the Verdeam, LLC firm brochure. You should have received a copy of the Verdeam, LLC brochure along with this brochure supplement. If you did not receive the firm brochure, or if you have any questions about the contents of this brochure supplement, please contact our Chief Compliance Officer, Gregory J. de Rozario at (303) 953-5125 or via email at gderozario@verdeam.com.

Additional information about Greg de Rozario is available on the SEC's website at www.adviserinfo.sec.gov.

The CRD number for Greg de Rozario is **7091572**.

While Verdeam, LLC may refer to itself as a Registered Investment Adviser, clients and prospects should be aware that registration itself does not imply any level or skill or training.

Please Retain a Copy of this Brochure for your Records

Education and Business Standards

Verdeam requires the successful acquisition of a college degree, or demonstrated and successful business experience, or combination of both, and requisite continuing education. Related employees of Verdeam may also be required to have examinations based on specific state examination requirements and continuing education requirements.

Greg de Rozario was born in 1988 and is the Compliance Officer for Verdeam, LLC and the Director of Development for Platte River Communities. Greg graduated with a BA in Economics from the University of Colorado in 2010.

Employment History

As Director of Development for Platte River Communities, Greg manages the home placement program and operations for each Platte River Partnership. Additionally, Greg serves as Chief Compliance Officer for Veream, LLC.

Greg previously served as a Field Artillery Officer with the United States Army where he focused on training and logistics at Battalion and Brigade Staff levels.

Disciplinary Information

Greg de Rozario has not had any legal or disciplinary events in his past. Clients and prospective clients can view the CRD records (registration records) for Greg de Rozario through the SEC's Investment Adviser Public Disclosure (IAPD) website www.adviserinfo.sec.gov or FINRA's BrokerCheck database online at www.finra.org/brokercheck.

Additional Compensation

Verdeam would be required to disclose additional information if any additional compensation was received from non-clients for advisory services. Presently, no such additional compensation is being received, Verdeam has no information to disclose in this regard.

Supervision

As the Chief Compliance Officer of Verdeam, Gregory J. de Rozario is primarily responsible for the compliance and supervision of Verdeam, LLC and its employees. As Chief Compliance Officer, Gregory adheres to the policies and procedures described in the firm's Compliance Manual. Advisory clients may contact Gregory J. de Rozario directly by calling (303) 953-5125 or via email at gderozario@verdeam.com.