

**Item 1.       Cover Page**

**MIRABILUS MANAGEMENT, LLC**

27874 VIA CORITA WAY  
LOS ALTOS HILLS, CA 94022  
[WWW.WEBSITE.COM](http://WWW.WEBSITE.COM)

Narendra Santhanam  
(XXX) XXX-XXXX

**FORM ADV PART 2A  
Informational Brochure  
September 15, 2021**

**This brochure provides information about the qualifications and business practices of Mirabilus Management, LLC. If you have any questions about the contents of this brochure, please contact us at (XXX) XXX-XXXX. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.**

**Mirabilus Management, LLC is registered as an Investment Adviser with the SEC. Our registration does not imply a certain level of skill or training.**

**Additional information about Mirabilus Management, LLC also is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). An investment adviser’s registration with the SEC does not imply a certain level of skill or training.**

**Item 2.           Material Changes**

Since this is the first filing of the Form ADV Part 2A for Mirabilus Management, LLC, there is nothing to report. In the future, any material changes made during the year will be reported here.

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#### **Item 4. Advisory Business**

For purposes of this brochure, “Mirabilus” means Mirabilus Management, LLC, a Delaware limited liability company.

Mirabilus owned by Narendra Santhanam, is a Registered Investment Advisory firm established in September 2021. Since we are a new entity, we currently do not have discretionary or nondiscretionary assets under management. As a fiduciary, we must disclose any conflict, or potential conflict, to you prior to and throughout our advisory relationship. We are legally and ethically required to always act in your best interest. We have adopted a Code of Ethics and fully disclose how we are compensated (see Item 11 below). This minimizes conflicts of interest.

##### **Business Consulting**

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Through a proprietary network of relationships, Mirabilus will identify and contract with companies in need of business consulting. In addition to providing advice on how to streamline business function and improve the quality and efficiency of these companies, Mirabilus will also provide advice on potential mergers and acquisitions. Through third-party capital raises, Mirabilus will also be part owner of the firms with which they contract.

##### **Portfolio Management Services**

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Mirabilus provides portfolio management services to businesses and institutional clients.

#### **Item 5. Fees and Compensation**

##### **A. Fees Charged**

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Mirabilus receives compensation in the form of fixed transformation and management fees.

#### **Item 6. Performance-Based Fees**

Mirabilus will not charge performance-based fees.

#### **Item 7. Types of Clients**

We provide business consulting and portfolio management services to business and institutional clients. There is no minimum to become a client of Mirabilus.

## **Item 8. Methods of Analysis, Investment Strategies, and Risk of Loss**

### **Identification and Sourcing**

The principals of Mirabilus work through their networks and direct calling efforts to develop strong relationships with numerous market participants, such as management teams, senior lenders, other mezzanine providers, and investment banks. In addition, Mirabilus may also be sought out by borrowers or other lenders to participate in an investment.

Each of the principals of the firm is actively involved in identifying potential investment opportunities. Initial screening is carried out by one or more of the principals. If the transaction is potentially attractive, the principals will decide as a group whether to pursue the opportunity.

### **Analysis and Due Diligence**

The due diligence process is designed to identify and substantiate the particular attributes of each potential investment. Each investment undergoes a credit review process, including analysis of business and operational dynamics as well as both historical and projected financial information. Areas of additional focus may include management or sponsor experience and capability, industry and competitive dynamics and tangible and intangible asset values. The principals may also seek to verify any understandings established during due diligence by personally contacting customers, suppliers and competitors. On-site due diligence may also be performed to provide support for the investment thesis.

## **Item 9. Disciplinary Information**

### **Criminal or Civil Actions**

Mirabilus and its management have not been involved in any criminal or civil action.

### **Administrative Enforcement Proceedings**

Mirabilus and its management have not been involved in administrative enforcement proceedings.

### **Self-Regulatory Organization Enforcement Proceedings**

Mirabilus and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of LOWA or the integrity of its management.

## **Item 10. Other Financial Industry Activities and Affiliations**

### **A. Broker-dealer**

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None of the principals of Mirabilus, nor any related persons are registered, or have an application pending to register, as a broker dealer or as an associated person of the foregoing entities.

### **B. Futures Commission Merchant/Commodity Trading Advisor**

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None of the principals of Mirabilus, nor any related persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

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

- A. A copy of the Code of Ethics is available upon request. Our Code of Ethics includes discussions of our fiduciary duty to clients, political contributions, gifts and entertainment.
- B. Mirabilus does not recommend to clients that they invest in any security in which Mirabilus, or any principal thereof has any financial interest.
- C. Firm principals may at some point recommend and choose to invest in a security in their personal account that is already in, or being considered for, a client account. Principals will not place personal trades before client trades in the same security.
- D. Firm Principals may at some point choose to invest in a security in their personal account at the same time that security is being traded for or being considered for, a client account. Principals will not place personal trades before client trades in the same security at the same time.

A copy of the Code of Ethics is available to any client or prospective client upon written request to: Attn: Daniel C. Flynn, Mirabilus Management LLC, 27874 Via Corita Way, Los Altos Hills, CA 94022.

## **Item 12. Brokerage Practices**

### **Factors Used to Select Custodians and/or Broker-Dealers**

Mirabilus does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the client based on their need for such services. Mirabilus recommends custodians based on the reputation and services provided by the firm.

## **1. Research and Other Soft-Dollar Benefits**

Mirabilus does not receive soft dollar benefits.

## **2. Brokerage for Client Referrals**

Mirabilus receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

## **3. Clients Directing Which Broker/Dealer/Custodian to Use**

Mirabilus recommends a specific custodian for clients to use. Not all advisers require their clients to direct brokerage.

### **Item 13. Review of Accounts**

#### **Oversight and Monitoring**

### **Item 14. Client Referrals and Other Compensation**

#### **A. Economic Benefit Provided by Third Parties for Advice Rendered to Client.**

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This item is not applicable, as Mirabilus is not provided any economic benefit by third parties for providing services to clients.

#### **B. Compensation to Non-Advisory Personnel for Client Referrals.**

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Mirabilus does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **Item 15. Custody**

### **Item 16. Investment Discretion**

For those accounts where Mirabilus provides Portfolio Management Services, Mirabilus maintains discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client.

**Item 17.      Voting Client Securities**

Copies of our Proxy Voting Policies are available upon request.

From time to time, shareholders of stocks, mutual funds, exchange traded funds or other securities may be permitted to vote on various types of corporate actions. Examples of these actions include mergers, tender offers, or board elections. Clients are required to vote proxies related to their investments, or to choose not to vote their proxies. Mirabilus will not accept authority to vote client securities. Clients will receive their proxies directly from the custodian for the client account. Upon a client's request, Mirabilus will give clients advice on how to vote proxies, but it is the responsibility of the client and the outside managers to vote client securities.

**Item 18.      Financial Information**

There are no material financial circumstances or conditions that would reasonably be expected to impair our ability to meet our contractual obligations to our clients.