

Item 1. Cover Page

MIRABILUS MANAGEMENT, LLC

27874 VIA CORITA WAY
LOS ALTOS HILLS, CA 94022
WWW.WEBSITE.COM

Narendra Santhanam
(646) 395-3900

**FORM ADV PART 2A
Informational Brochure
September 27, 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 (646) 395-3900. 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. 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

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.

Investment Management Services

Mirabilus provides investment management services to clients who invested in the firms to which Mirabilus provides Business Consulting services. The recommendations made and management thereafter are for private investment vehicles only.

Item 5. Fees and Compensation

A. Fees Charged

Mirabilus receives compensation in the form of fixed transformation and management fees. The fee for Business Consulting will be an annual fixed dollar fee based on the assignment and the complexity of the engagement. Fees will vary and are negotiable. Investment management fees will be a percentage of the amount invested. The percentage will vary according to client and is negotiable. Generally, management fees will range from 0.00% to 2.00%.

B. Fee Payment

Fees will be payable quarterly, in advance, upon receipt of an invoice from Mirabilus. If the client terminates the agreement prior to completion of the services, any unearned fees will be returned to the client.

C. Other Fees

There are additional out of pocket fees clients may be expected to bear. These include the legal fees associated with the closing of investments, diligence expenses and other costs of investment.

Item 6. Performance-Based Fees

Mirabilus will not charge performance-based fees.

Item 7. Types of Clients

We provide business consulting and investment management services to small and large businesses. There is no minimum to become a client of Mirabilus.

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

Investment Strategy

Mirabilus has an Investment Committee which is comprised of Mirabilus' senior firm professionals.

The investment decision process is ongoing during the life of a potential investment and is adapted and modified from time-to-time, as appropriate, depending on the specific elements of each investment opportunity. Each potential investment is continuously evaluated during the due diligence process to determine, among other things, whether the team believes that: (i) the underlying industry fundamentals are sound; (ii) Mirabilus, along with the company's management team, other identified professionals or corporate partners, have the capability to create and execute a long-term growth strategy; (iii) the purchase price and terms are reasonable; (iv) any potential liabilities not reflected in the financial statements are correctly identified and are within acceptable parameters; and (v) the investments' return objectives can be met within acceptable risk parameters, particularly with respect to strategy, financial projections, underlying assumptions, and capital structure.

Identification and Sourcing

The principals of Mirabilus work through their networks to develop strong relationships with numerous market participants, such as management teams and investment banks. 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.

Mirabilus holds a weekly team meeting where they discuss the basic overview of the transaction, the process and thesis. The management team then meets to review the preliminary due diligence for the investment. The Investment Committee then decides whether to pursue the investment, any budgeting or due diligence issues and the terms of the bid. At this time an investment memo is created. Prior to closing, various discussion occur surrounding legal-related items, structuring, financing, taxes, etc.

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 Mirabilus.

Item 10. Other Financial Industry Activities and Affiliations

A. Broker-dealer

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

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

As Mirabilus recommends private investments, Mirabilus anticipates that investments in publicly traded securities will be infrequent occurrences (e.g., money market instruments pending investment in a portfolio company, securities held as a result of initial public offerings of portfolio companies, going-private transactions, etc.). Because Mirabilus focuses on making investments in private securities, it does not engage in traditional brokerage transactions, receive research from any broker-dealer, utilize any soft dollar relationships with any broker, nor permit investors to stipulate the direction of brokerage. In the event that a portfolio company becomes publicly traded, Mirabilus will develop and disclose appropriate procedures for trading, brokerage, soft dollars, trade aggregation, and any other trading or brokerage related issue relevant at the time.

Item 13. Review of Accounts

Mirabilus focuses on investments in private companies. All investments are carefully reviewed by the Investment Committee. Portfolio companies are reviewed on a continuous basis.

Item 14. Client Referrals and Other Compensation

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

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.

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

Item 15. Custody

Mirabilus will not have custody of client funds or securities. Private investments will be held in book form, with any certificated securities held by the clients or their designees.

Item 16. Investment Discretion

For those accounts where Mirabilus provides Investment 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.

Clients are primarily invested in privately-held portfolio company investments which typically do not issue proxies; therefore, the voting of proxies and participation in class actions is not currently applicable to Mirabilus. The investment opportunities that Mirabilus seeks allows for influence on the management, operations and strategic direction of the portfolio companies; through majority interest and/or through its employees who serve as officers and directors on portfolio company boards. The exercise of control and/or significant influence over a portfolio company imposes additional risks of liability for product defects, environmental damage, failure to supervise management and other types of liability in which the limited liability generally characteristic of business operations may be ignored. The exercise of control and/or significant

influence over a portfolio company could also expose the assets of the Funds to claims by such portfolio company, its security holders and its creditors.

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.