Firm Brochure Public Document

(Part 2A of Form ADV)

September 21st , 2026

Item 1: Cover Page

AnalyticEdge Finance

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Part 2A of Form ADV (the "Brochure") provides information about the qualifications and business practices of AnalyticEdge Finance, LLC. If you have any questions about the contents of this Brochure, please contact us at (214) 851-5798 and/or thomas.wilke@analyticedgefinance.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. AnalyticEdge Finance, LLC is registered as an investment adviser with the state securities administrator of Texas; however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.

Additional information about AnalyticEdge Finance is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Item 5: Fees & Compensation – updates to billing procedures, calculations, and client correspondence. Changes from pro-rated to Arrears billing based on avg billable balance.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss - Investment model offerings

Item 13: Review of Accounts – Updated procedures and investment model offerings

Item 15: Custody – We recommend Schwab

Item 19: Advisory Business – updates to how the firm documents and maintains compliance with TSSB (*Texas State Securities Board*).

Item 19B: Outside Business Activities – the advisor engages in part-time work with a group called Altruistic to support individuals with disabilities.

Item 3: Table of Contents

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Item 4: Advisory Business

A. Description of AnalyticEdge Finance

AnalyticEdge Finance LLC is located in Plano Texas within the residential home of the sole acting member of the firm. The business provides customized investment management and investment advice services to all individuals regardless of net worth or investable assets. This business is not publicly held and is solely owned and operated by the resident, Thomas Wilke. The firm is state registered with Texas and is not SEC registered. The act of registration does not imply the skill or training of the owner. The firm has been providing investment advice to clients since November 2024. The investment advisor, Thomas Wilke, seeks to provide fiduciary financial advice to all individuals regardless of financial condition.

B. Advisory Services

Advisory services offered are Estate Planning, Life & Health Risk Management, Retirement Planning, Investment and Portfolio Management, and services are also called "Comprehensive Financial Planning" when multiple of the listed services are used. AnalyticEdge Finance holds itself out as specializing in comprehensive financial advice for families and those transitioning to retirement. My advice is given in conversation from appointments and can include written customized documentation provided by eMoney and Portfolio Visualizer to help illustrate and summarize discussed advice with clients. Documentation can include summarizing financial goals and objectives along with given recommendations and quantified calculations to show the level of risk attributed of those recommendations along with back-tested performance. Clients can enter into an agreement with the firm for *Advice with Investment Management* or for *Advice Only*. For Advice only services, a customized deliverable is provided that would comprehensively cover personal finance engagements with the client and would include a personalized portfolio recommendation. The service is one-time only and would not include any engagement by the advisor to implement recommendations, responsibility lies with the client to take action on any given recommendations and advice. *Advice with Investment Management* will include discretionary investment management and is ongoing. Regarding the investment recommendations, our quantified analysis uses Monty Carlo simulations, portfolio back-testing, and efficiency frontier optimization to determine the level of risk and expected return for a given set of securities using historical data. This process uses an external software called Portfolio Visualizer to build reports that reflect back-tested results of a given portfolio recommendation. Other examples of advice utilize financial and economic fundamentals to determine the effectiveness or direction of a company and/or market. Clients should acknowledge that past performance does not indicate future performance. The firm also provides financial education workshops free to the public. These workshops would highlight topics related to retirement planning and general financial advice. AnalyticEdge Finance also leverages TAMP platforms from Charles Schwab to identify if alternative professional investment managers (investment sub-advisors), have portfolios available that are suitable for specific client investment needs. If clients prefer to have access to such sub-advisors, clients should acknowledge that such investments are accessible without AnalyticEdge Finance and bear investment risk. Additional advice services are available to clients as a 3(21) Fiduciary for small business 401k Plans. AnalyticEdge as a 3(21) Fiduciary, helps the business owner and plan sponsor setup the investment options for participants and provide ongoing monitoring . The firm has a developing relationship with *The Retirement Plan Company LLC, DBA as DayBright Financial* who provides recordkeeping, administration, and custody services and are a referral business from Charles Schwab. As a 3(21) Fiduciary, AnalyticEdge Finance provides non-discretionary 401k advice and services for small businesses. Small firms that choose to engage with AnalyticEdge Finance for 401(k) services also receive financial wellness services from the firm for their 401(k) Plan participants as part of the services provided in exchange for the 401(k) Advisory Fee. These services include retirement planning, plan participation rights, investment advice, and the same advisory services provided to individual families. A client agreement is signed when the participant elects to begin receiving financial wellness services.

C. Tailoring of Advice

AnalyticEdge Finance adheres to a fiduciary obligation to our clients. As such any and all work or services provided will be inline with the client's financial goals and objectives. As such, financial advice is tailored to individuals and through the client agreement, the client will receive ongoing advice and an advice deliverable is provided if selected in the Client Agreement. A*dvice with Investment Management* provides ongoing services while *Advice Only* provides an advice deliverable and does not incorporate ongoing support or monitoring since it is a one-time engagement. This deliverable is modular and is a comprehensive summary of the client's financial condition, their goals and objectives, advice recommendations, current and future cash needs, and a portfolio analysis or proposal summary. It is a document highlighting all discussion topics between the investment advisor and the client including the client's financial goals and is narrated as a plan. Plans are developed as a delivered document to summarize advice and services given to the client and the recommendations and future initiatives the client has with respect to their financial condition. Documentation can include financial statements such as cash flow statements and balance sheets, portfolio risk and performance, modeling of cash/investment returns, and statements/checklists for a client's financial picture. Investment management services and the ongoing discretion of client's assets allow the firm to buy and sell securities on behalf of a client for their account and such trades will be pursuant to the client's financial goals, objectives, and investment suitability. All client portfolios are personalized and custom, so no allocation will be copied and given to a different client. A similar pattern may appear between client needs and as such, recommendations to allocations such as 60/40 will occur, but their underlying holdings and benchmarks will be unique to the client. Constraints are always allowed and as such, clients can impose any restrictions they require on their investments. Advisory services also include operational services such as disbursements and periodic contributions, and any action that is required to be taken at a custodian in adherence to the client plan. Examples of such services include investment restrictions to SRI securities, (Socially Responsible Investing), industry limitations as determined by GICS (Global Industry Classification Standard). Where a service cannot be provided, full disclosure will be made to clients. The types of reports provided to clients are generated by our vendor software and custodian platforms, eMoney and Charles Schwab respectively. Reports that are systematic and provided routinely will be those documents and statements provided by Charles Schwab and eMoney which will be touched upon later in this brochure. The Statements generated by Charles Schwab must adhere to SEC and FINRA rules for broker/dealers about client communications.

D. Wrap Fee Programs

AnalyticEdge Finance does not participate in Wrap Fee Programs. All accounts are billed in separate transactions where the fee is fully disclosed on account statements, contrary to a Wrap Fee Program which consolidates all fees into one transaction.

E. Disclosure of Client Assets Under Management

AnalyticEdge Finance does not currently manage client assets. As of December 31st, 2025, the firm had $5,293,203.53 in assets under management and 10 active participant accounts under discretion. The firm also allows for non-discretionary management. As of

December 31^{st}, 2025, the firm had $0 in non-discretionary assets, and 0 accounts under non-discretionary management.

Item 5: Fees and Compensation

A. Investment Advisory Fee

AnalyticEdge Finance is compensated through an annualized fee charged quarterly as a percentage of assets under management. Calculations of the fee are based the average billable value of accounts of the investable assets under management and adhere to a tiered schedule to provide discounts for an increase in assets. As an example, using the fee schedule table under Exhibit 1, a household with investable assets of $1,500,000 would be charged a fee rate of 0.85%.

Assets Under Management	**Fee Rate**
Up to $1,000,000	1.00 %
$1,000,000 - $2,000,000	0.85 %
$2,000,000 - $5,000,000	0.75 %
$5,000,000 +	0.65 %

*Exhibit 1 – Fee Schedule Table

All fees can be negotiated to be different from the above fee schedule. Alternatively, if no discretionary account services are needed, and there are no investable assets, a flat rate fee can be provided for the Advice Deliverable and payment must be in a check made payable to AnalyticEdge Finance. The flat rate fee is capped at $5,000 and is negotiable. This fee is due upon delivery of the advice deliverable.

The primary owner and member of AnalyticEdge Finance, is also compensated through commissions for the sale of insurance and annuity products such as term life insurance, whole life insurance, universal life insurance, indexed universal life insurance, and fixed annuities. Where an education seminar or workshop event is hosted by AnalyticEdge, it will be free of charge and open to the public. Such workshops do not collect information on attendees and are purely educational in nature. No solicitation of products or services will be made during an educational event. All investment advisory fees are not inclusive of any investment sub-advisors or third party portfolio managers who may debit a different rate and schedule. Any fees associated with work or recommendations will be fully disclosed prior to engagement. Clients will have an option of selecting either *Investment Management with Advice* or *Advice Only with Advice Deliverable*. The *Advice Only* is capped at $5,000 as a one-time fee and is charged upon delivery of the document to the client directly.

B. Fee Calculation and Debiting

Client fees are deducted from the client's discretionary accounts on a quarterly basis in arrears. The average billable balance method is to be applied for billable accounts within the household. As policy, if the accounts under management are in modeled portfolio with a cash buffer, then the cash will be included in the billable assets; however, if the account is limited discretionary, then cash and money market funds are not included in the billable balance. If the account is non-discretionary then it will not be billed on. The start date for billing periods is during the quarterly calendar period and the average billable balance will be calculated anytime a balance for an account exists.

For client terminations, where advanced notice was given, the advisor will not seek to process remaining fee, instead the client will be promptly terminated and an invoice for any outstanding advisory fees will be send to the client. Similarly, where a client does not inform the advisor, and a bill was uncollected, then an invoice will still be sent to the client for the remaining fees and a request for check payment will be made. If clients prefer an invoice prior to debiting of fees, AnalyticEdge can accommodate and will be available to select when completing the Client Agreement.

The firm does charge advisory fees on assets where the client directed trades, these can arise when the account is a limited-discretionary account and the assets are part of the broader financial plan for the client. Where the account is non-discretionary and the advisor has no authority to trade, then the account will not be billed on directly. Any account, can be setup as an alternative debit account for billed assets. As an example, if the client solicits the advisor to purchase shares of Apple stock, in a limited-discretionary account where the underlying is part of the broader financial plan, then the advisor is able to bill for advisory fees; however, if the client solicits the trade and the shares are consequently transferred to the non-discretionary account, then they will not be billed on.

Quarterly Billing is calculated as follows for an example:

Avg. Billable Amount x Fee Rate x Duration of Time = Fee Rate

Example:
Quarter in Arrears – billed in July for Q2
Avg Balance of $100,000 x 1.00% x 91 days / 365 days = $249.31

The ***Advice Only*** services within the client agreement charges up to $5,000 for the delivery of the Financial Plan and is charged upon delivery of the document to the client directly. Clients will have a 30 calendar-day grace period to review the document before requesting a full-refund, the request for a refund must be provided in writing over email or letter with a post-mark date within the thirty calendar days. Clients are entitled to a full refund of the *Advice Only* services if they are dissatisfied with the work and are not required to provide a reason. Rebates are issued via check within 7 business days.

C. Other Potential Fees Incidental to Services

Clients are subject to additional fees charged by vendors, where AnalyticEdge Finance receives no compensation. Such fees include, but are not limited to, custodian transaction costs such as commissions, custodian account maintenance fees, custodian account closure fees, and custodian wire fees, and investment sub-advisor fees for portfolio management.

D. Payment Cycles

AnalyticEdge Finance process' quarterly fees in arrears based on avg billable balance of accounts for services during the prior quarter. All quarterly bills are calculated on the 2nd Wednesday upon the start of the calendar quarter (January, April, July, October), bill processing occurs on the 3rd Wednesday upon the start of the calendar quarter. Fees associated with investment sub-advisors will be charged at a separate rate and fee schedule determined by the manager at the time of onboarding or as advertised by their portfolio program. Fees will vary by rate and time of debiting for investment sub-advisors.

E. Other Potential Fees as Compensation to AnalyticEdge Finance

AnalyticEdge Finance receives compensation in the form of an advisory fee charged for discretionary investment management, or as a flat fee for Advice, or a commission for an insurance product offered through different insurance carriers. AnalyticEdge Finance, as a broker, works in the best interests of their clients when identifying insurance policies suited for their financial needs. Such products would be sourced and quoted from a partnership with Ash Brokerage which is the insurance marketing organization that facilitates our brokerage-process. AnalyticEdge does not receive commission or any other form of compensation for the sale of mutual funds or investment products. AnalyticEdge does not have a securities license to receive commissions from the sale of investment products.

a. The sale of insurance products represents a conflict of interest for AnalyticEdge Finance due to the incentive to recommend insurance products against the client needs. AnalyticEdge Finance holds itself to the fiduciary standard and as such, an insurance need must be identified. Access to insurance products should not be the only objective when clients are working with AnalyticEdge Finance. Such products are not considered an investment asset and are not subject to investment advisory fees as outlined in Item 5.A.
b. Clients have an option to purchase insurance products they need from other agents or brokers that are not affiliated with AnalyticEdge Finance.

c. No more than 50% of the advisor's income comes from insurance commissions, and no more than 50% of all revenue from AnalyticEdge Finance comes from insurance. The advisor has not generated any revenue from the sale of insurance in the last 12 months.
d. Advisory Fees are not adjusted for any business conducted for an insurance-based product.

Item 6: Performance-Based Fees and Side-By-Side Management

We do not charge any performance-based compensation (fees based on a share of capital gains on or capital appreciation of the assets of a client). The firm does not engage in side-by-side management. Each client's investment is unique to the client's needs.

Item 7: Types of Clients

AnalyticEdge Finance works with and provides advice to the following types of clients:

- Individuals and Families, regardless of networth, income, or investable assets.
- Legal Entities such as trusts, estates, small businesses or corporations, or charities.

There is no account minimums or minimum networth or investable asset requirements.

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

A. Methods of Analysis

Analysis will be centered across the client's financial objectives and constrained to a required time-horizon, short term cash flow requirements, or other concerns the client has with different life events. Investment portfolios will be developed and focused towards a client's acceptable level of risk and their needed return to achieve their goals and objectives. As such, accounts may be divided up into smaller core and satellite portfolios that, combined, meet with the client's cash flow and investment objectives. Concurrent with the portfolio will be an assessment across multiple spectrums to determine if the investment is appropriate: taxable impact, liquidity needs, net expenses charged to funds, and manager tenure of the fund. Where individual stocks or fixed income securities are present, then more fundamental analysis will occur utilizing financial ratios to determine the capitalization structure, cash flow, earnings, or to otherwise determine the performance of a company. All holdings and portfolio development will utilize monty carlo simulations and an efficiency frontier to determine the most optimal level of return for a given level of risk and will incorporate back-testing of a given portfolio to determine its effectiveness. AnalyticEdge will utilize any asset style or class that makes sense for the client's investment requirements. Such securities can include but are not limited to: common stock, real-estate investment trusts, unit-investment trusts, corporate bonds, municipal bonds, government issues, mutual funds, exchange-traded funds, exchange-traded note, and options securities. Clients should acknowledge that investing in securities involves risk of loss, and that clients should be prepared to bear such loss.

B. Investment Strategies

AnalyticEdge Finance offers three main **Core Portfolios** which seek to provide asset allocation and are designed to meet the majority of risk tolerances and investment suitability's of our clients. These core portfolios are:

Core Conservative Income – a 30/70 equities to fixed income asset allocation portfolio designed for conservative investors that need low volatility and investment income. Primary risks to an investor in this strategy are interest rate risk, reinvestment risk, and inflation risk.

Core Strategic Moderate – a 65/30/5 equities, fixed income, and real-estate asset allocation portfolio designed for moderate investors that desire moderate risk with a blend of income and growth. Primary risks to an investor in this strategy are market risk, interest rate risk, and financial risk.

Core Strategic Aggressive – an 80/10/10 asset allocation portfolio of Equities, Commodities, and Real-Estate investments. This is for more aggressive investors with long time horizons. Primary risks to the investor in this strategy are market risk and liquidity risk.

Beyond our core strategies we also offer personalized portfolios. These portfolios will consist of different asset allocations and will be geared towards the client's investment objectives. Each individual client's investment portfolio will be unique; however, unless specifically requested by a client, portfolios will be low trading volume and where rebalancing will either come recommended as frequent as monthly and as infrequent as annually. Individual holdings may be added or removed depending on the strategy discussed with the client. All personalized portfolios will be subject to risks associated with investing such as reinvestment risk, inflation risk, capital risk, market risk but each portfolio's risk might be structured to mitigate certain risks thus illustrating how personalized portfolios can be built.

C. Risk of Loss

Clients need to be aware that investing carries inherent risk in loss of principal, or more than principal invested, and that past performance is not indicative of future results and that performance is not guaranteed. AnalyticEdge Finance cannot provide any representation or guarantee that financial goals will be achieved. Depending on the portfolio, each investor may be subject to one or more of the following risks:

- Systematic Risks – cannot be subverted through portfolio diversification
    - Purchasing Power Risk – Otherwise known as inflation risk, that the prices of goods or services increases.
    - Reinvestment Risk – As interest bearing investments mature, the reinvestment of those proceeds may not be into equal or better investments. Such risks occur when the market does not offer any suitably similar investment opportunities.
    - Interest Rate Risk – That as interest rates rise or fall it will impact the valuation of an investment portfolio
    - Market Risk - Either the market as a whole, or the value of an individual company, goes down, resulting in a decrease in the value of client investments. Global markets are interconnected and may in the future lead, to increased short-term market volatility and may have adverse long-term and wide-spread effects on world economies and markets generally.
    - Exchange Rate Risk – The uncertainty that comes with international investing where currency exchanges fluctuate and this impacts the return associated with dividends, interest, and capital gains.
- Non Systematic Risks – can be mitigated through portfolio diversification
    - Business Risk – The risk that a company and its performance can dwindle or fail entirely based on poor management decisions.
    - Financial Risk – Also called credit risk, it's a company's inability to meet debt obligations
    - Regulatory Risk – Changes in the financial industry and regulation such as monetary policy changes, can impact an individual's portfolio
    - Legislative Risk – Resulting from changes in fiscal policy made by congress and if legislation or laws impact the ability of a company to succeed.

- Country Risk – Associated with international investing and the risks associated with the economic and political stability of foreign nations.
- Liquidity Risk – The speed to which an asset can be converted into cash.

Item 9: Disciplinary Information

The Firm is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the Firm, or the integrity of our management. The Firm reviews advisory personnel records on a periodic basis to ensure that no disciplinary events have been reported. The Firm has no legal or disciplinary events in response to this item. The Firm maintains ADV Part 2B for its advisors, which are provided to each client, and detail each individual team member's professional credentialing, and other pertinent information about the advisor. Item 9 is not applicable to us as we have no materially reportable actions, legal or disciplinary events.

Item 10: Other Financial Industry Activities and Affiliations

A. **Broker/Dealer**
   AnalyticEdge Finance does not currently have an affiliation with a broker/dealer as a registered representative, nor is the firm pending affiliation.
B. **Insurance Affiliations**
   AnalyticEdge Finance is currently using a Brokerage General Agency called Ash Brokerage, also known as an Insurance Marketing Organization, they provide financial advisors with a back-office to provide illustrations, quotes, and services to complete carrier applications on behalf of clients. Through this agency, the Advisor has established themselves with a 1099 contract. Ash Brokerage also facilitates the commissions paid for the sale of insurance products. AnalyticEdge does not have a securities license to receive commissions from the sale of investment products.
C. **Material Vendor Relationships**
   The firm has several vendors for purposes of operating as an investment advisory business, such vendors provide custody, analytics, and research services. These vendors are Charles Schwab, eMoney, Portfolio Visualizer, and StockAnalysis.com. These vendors provide research services and information that impact the advice services provided by

AnalyticEdge Finance. The firm recognizes the conflict of interest that exists thru Ash Brokerage with the sale of insurance products. AnalyticEdge Finance seeks to mitigate this conflict of risk by disclosing to clients that they are free to purchase insurance products through other agents and that clients do not have to purchase such products at all. Clients will also receive disclosure from the firm, and its representatives, that commission is received from the sale of these products, and they do not reduce or waive the advisory fees for the sale of these products. The firm also helps mitigate the conflict of interest by outlining in the firm's Code of Ethics, the advisor's responsibility to provide a fiduciary duty to clients which requires employees to put the interests of their clients ahead of their own.

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

A. **SEC Code of Ethics for Rule 204A-1**
   A requirement of SEC-registered advisors, AnalyticEdge Finance is not SEC registered, this is non-applicable. The firm has a Code of Ethics that can be provided upon request.
B. **Material Interest in Securities**
   Securities in which AnalyticEdge Finance has a material interest, at present there is none. AnalyticEdge Finance has no material interest in any security.
C. **Ownership in securities we recommend**
   The advisor currently has their own securities portfolio consisting heavily of ETFs, Common Stock, and a handful of mutual funds. These securities are commonly known issuers such as the S&P 500(SPY), or Apple (AAPL), to which AnalyticEdge has no material interest in. Individual stocks as a personalized portfolio component would have strict scrutiny around the underlying investments and the amount of research that goes into them. To address conflicts of interest, the owner and other future firm members will not effectuate any personal transactions during the same period that client portfolio implementation, portfolio maintenance, or portfolio rebalancing occurs. A period shall be described as same business day.

Item 12: Brokerage Practices

A. Custodian & Brokers Used

AnalyticEdge Finance seeks to work with reputable and well-established firms such as Charles Schwab, Fidelity Investments, and Goldman Sachs. Currently we have a working relationship with Charles Schwab and will utilize their platform for custody and brokerage services, we are currently constrained to this singular custodian; however, we have experience with their platform and understand their execution process. Our belief is that clients utilizing an investment advisor, should have an ability to easily transition their accounts and assets. Charles Schwab and Fidelity Investments have industry leading features for retail investors that makes them suitable for all clients. Their fees are primarily from transaction costs, to which expenses can be kept low through prudent investing with minimal trading.

1. **Research and Soft Dollar Benefits**
    a) Our firm does not receive soft dollars in excess of what is allowed by Section 28(e) of the Securities Exchange Act of 1934. The research obtained by our firm will generally be used to service all our clients.
    b) When the custodian charges commissions for trades, those trades may have included research provided by the custodian, and thus AnalyticEdge Finance is benefiting from the exchange. The client should acknowledge that this is considered a conflict of interest when AnalyticEdge Finance utilizes Charles Schwab as their primary custodian. Full disclosure is given on the research completed for clients, and AnalyticEdge does not source all research from one source.
    c) Our firm does not direct client transactions to a particular broker-dealer in return for soft dollar benefits.
    d) All soft dollar benefits, go to service all clients, regardless if the client has an account open at the custodian, namely, Charles Schwab.
    e) AnalyticEdge Finance does not make commissions on securities.
    f) There are no procedures during the last fiscal year to direct client transactions in return for soft-dollar benefits.
2. **Brokerage for Client Referrals**
    a) Engagement in Referral Business - AnalyticEdge Finance does not engage in a referral business from broker-dealers.

b) **Referral Operating Procedures -** The firm does not have procedures to direct client transactions with respect to a broker-dealer referral, since the firm does not engage in referral business from broker-dealers.

3. **Directed Brokerage**

   a) **Engagement in Prime Brokerage -** The firm does not engage in direct brokerage trading and thus would not recommend, request, or require, that a client have executions through a broker-dealer. Through Charles Schwab, the best possible price will be sought on what traders have available.

   b) **Disclosure of Prime Brokerage -** The firm acknowledges that securities can also be obtained through trade away by leveraging a prime brokerage account, this is a process whereby another security can be purchased from a separate brokerage institution such as BlackRock and then transferred into custody of AnalyticEdge through a Prime Brokerage account and then distributed to client accounts. This type of process is for the purpose of obtaining the best price for a security and is coupled with a flat fee ('Trade-Away' fee) charged by Charles Schwab, such a fee can be too high depending on the size of the transaction, and as such, to minimize trading costs, the firm will leverage Charles Schwab to execute trades.

B. Block Trading or Trade Aggregation

The conditions under which the firm and its advisor aggregate the purchase and sale of client securities is independently, and not through a block transaction. Currently the firm does not have substantial clients or structured portfolios to be shared commonly among clients. Rebalancing time frames are also subject to the anniversary date of the model inception adding to the uniqueness of the services conducted. Thus trades are limited and custom to the client, the costs are minimized to the individual transaction charges that would otherwise be the same as charged to a retail client at the same custodian. Since transactions are not aggregated to apply good execution price and reduced commissions, clients are at higher risk to incur poorer execution price and will pay normal commission pricing to the broker-dealer compared to a larger and more well-established registered investment advisory firm.

Item 13: Review of Accounts

A. Frequency of review and nature of review.

Clients will have their portfolio reviewed on a quarterly basis to determine if any significant changes need to occur and a meeting conducted with the client at minimum once per year. Requests to meet more frequently four times a year is also permitted and reasonable and will not change the underlying advisory fee.

B. **Triggers for a Review**

Due to the personalized nature of services conducted within AnalyticEdge, there will be established notifications and warnings to appear if there appears to be a strong deviation from a financial plan. Such warnings are designed to provide ongoing maintenance, monitoring, and management of client assets and to subvert potential fraud. Such warnings include but are not limited to: excessive or unexpected withdrawals, significant price drops in securities, changes in address or profile information of the account. For our core models, the firm has established these models on iRebal and will use Charles Schwab for alerts on when a model has met a drift or calendar rebalance parameter.

C. Frequency of Regular Reports

Where Investment Management Services are provided along with an Advice Deliverable, the delivery will be provided and updated on an annual basis on the deliverable due-date anniversary which is predicated on the client agreement date. If a client agreement is for Advice Only, it is considered due within 6 months of the agreement date and is not renewable unless a new agreement is signed. Other reports from custodians such as trade confirmations, account balance statements, account activity statements, should be provided by the custodian Charles Schwab on a monthly basis.

Item 14: Client Referrals and Other Compensation

A. Other Compensation

AnalyticEdge Finance does not receive any compensation or economic benefits from other parties or individuals (beyond previously mentioned Ash Brokerage) for providing advice services to clients.

B. Referrals Compensation

AnalyticEdge Finance is seeking to work with referrals across multiple vendors and businesses. When this occurs, the network providing the lead referral is compensated by the firm for the lead in the form of a flat fee payment in advance. This will create a conflict of interest thereby incentivizing AnalyticEdge Finance to promote the sale of investment advice services. For purposes of curbing the risks associated with failing to follow a fiduciary standard, AnalyticEdge Finance will have minimum standards with any vendor relationship providing referral clients to ensure that integrity is shared between our business' and that prospects and clients can receive financial advice in their best interest. Furthermore, while compensation is provided in advance, the advisor is required to disclose this conflict of interest to the client before any agreement between AnalyticEdge Finance and the client. The firm is obligated to adhere to SEC rule 206(4)-1 which governs investment advisor advertising, and in doing so, has strict limitations on how clients are solicited and what materials are present.

Item 15: Custody

AnalyticEdge Finance meets the FINRA definition of custody rules which specify custody exists where the investment advisor has the ability to debit fees and perform disbursements. Our firm maintains adherence to SEC Rule 206(4)-2, and for our primary custodian, Charles Schwab, is considered a qualified custodian. A specific requirement for adherence to this rule, is to have an independent surprise audit examination of the firm and its books and records. The independent examination must occur within the first 36 months. The firm does not accept any authority from clients in the capacity as a trustee or account owner. Due to Charles Schwab being our only custodian, we refer them to be the primary custodian for our clients.

Item 16: Investment Discretion

AnalyticEdge operates and conducts business on behalf of their clients by using discretionary authority. This authority allows the investment advisor the ability to determine which securities to buy and sell and the total amount to be bought or sold. If the client would prefer that expressed permission be given prior to a securities transaction, the firm offers non-discretionary account services which requires expressed client signoff prior to a transaction. Changes to authority can be made at the request of the client and would require a client signoff to effectuate.

Item 17: Voting Client Securities

AnalyticEdge Finance does not accept any authority to vote on proxy ballots on behalf of their clients. The firm will have operating procedures that check and confirm if clients accept proxy solicitations or if the advisor is selected to receive proxy statements. Clients should acknowledge that they may receive proxy ballots in their mailbox or email and can elect a vote if they choose. If our firm receives proxy statements, they will be forwarded to the correct client address. Clients may contact our office for questions about a particular solicitation but the firm cannot advocate for/against any one option or give advice on a given proxy ballot. The firm encourages clients to work with their custodian or transfer agent for additional questions on how to vote their proxy ballots.

Item 18: Financial Information

A. **Firm Financial Information**
Our firm is not required to show a balance sheet of our assets and liabilities because the firm does not require prepayment of more than $500 in fees in advance of services to be provided over 6 months.

B. **Disclosure of Financial Condition**
The advisor, Thomas Wilke, has a conflict of interest with their firm's financial condition and the ability to deduct fees from client accounts. AnalyticEdge Finance has prepared operational measures for client advisory fee billing that prohibit fees being deducted until the third Wednesday of every month when a billing cycle occurs, either monthly in arrears or quarterly in advance. This allows the client opportunity to terminate an agreement with an advisor before a fee is debited. Furthermore debiting can only occur where custody exists, those clients that enroll in Advice Only would not require custody of assets and payment is provided by check. Clients have the right to terminate their contract with the advisor within the first five days with no fees or charges.

Item 19: Requirements for State-Registered Advisers

A. **Management and Executive Members**
Thomas A. Wilke is the owner, operator, and chief compliance officer of AnalyticEdge Finance. Thomas attended Iowa State University and graduated in 2010 with a Bachelor of Science in History and Classical Studies. The first few years post college was spent working with individuals living with special needs providing rehabilitation and teaching individuals how to live independently. The first career in finance started at a small office in Des Moines, Iowa, working at a branch of Ameriprise as a non-registered clerical worker. In search of better prospects, Thomas moved to Dallas Texas in 2014 and became an Administrative Manager at United Capital Financial Advisers, a private wealth management and registered investment advisory firm. Thomas quickly attained a senior investment operations position within the firm providing back-office investment support. This continued until the acquisition of the firm by Goldman Sachs where Thomas, working as an Analyst, entered business intelligence and regulatory operations for Goldman. Thomas worked his way up to vice president and actively engaged in the culture of Goldman Sachs, participating in the Vice President's Advisory Council and hosting

several smaller workshops and programs across the firm. Additional information about my career history can be found on LinkedIn which can be accessed through the company website www.analyticedgefinance.com

B. Outside Business Activities

The CCO/Owner and Financial Advisor, Thomas Wilke, works part-time with special needs individuals at a dayhab center called Altruistic, in Plano TX.

C. Performance Based Fees

AnalyticEdge Finance does not engage in performance based fees.

D. Arbitration Claims and Prior Investment Activity

The owner and single member of AnalyticEdge Finance has not been involved in, or part of, any arbitration claims or hearing involving damages to clients as an investment related business activity, fraud or statement of omission, theft or embezzlement, bribery, forgery, counterfeiting, dishonesty or unfair unethical practices. The owner has not been found guilty of any crime or misdemeanor in a civil court or a ‘self-regulatory organization’ proceeding involving investment related business activity, fraud or statement of omission, theft or embezzlement, bribery, forgery, counterfeiting, dishonesty or unfair unethical practices.

E. Relationships with Issuers

AnalyticEdge Finance has no relationships or affiliations with un-listed or listed issuers.