

Firm Brochure Public Document

(Part 2A of Form ADV)

July 11th, 2025

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

1. Expansion of the firm’s advisory scope has broadened to small business 401k plans as a 3(21) Fiduciary.
2. The firm is no longer affiliated with World Financial Group as an outside business activity.
3. The firm now leverages Ash Brokerage for back-office use to provide clients with insurance-based products.
4. Conflicts of interests associated with World Financial Group and Ash Brokerage are addressed
5. Removal of an Advice Deliverable requirement for Investment Management services.

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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 and 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* 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.

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. When services are provided, based on the client agreement, advice and advice deliverable will be provided annually on a reoccurring basis. *Advice with Investment Management* provides an advice deliverable annually on a reoccurring basis and *Advice Only* provides an advice deliverable only once and the client agreement will be fulfilled after delivery of services and the client deliverable has been provided. 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 July 10th, 2025, the firm had \$27,237.71 in assets under discretion and 4 active participant accounts under discretion. The firm also allows for non-discretionary management. As of July 10th, 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 on the most recent quarter end market value 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 \$1,000 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. The firm does not charge advisory fees if the investable asset was solicited for ownership by the client directly. As an example, if the client solicits the advisor to purchase shares of Apple Stock, then those specific shares are not included in the billing calculation and are not subject to an investment advisory fee. 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 \$1,000 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 advance of the quarter's advisory services, and monthly for arrears billing when payment in advance could not be performed at the start of the quarter; if the net transaction of the

market value of securities or cash, exceeds \$20,000 then it will trigger an arrears bill. As an example, when an account is onboarded or a deposit in excess of \$20,000 occurs, then a payment for advisory services from the start date of the transaction to quarter end will occur the calendar month following. As an example, an account is opened and \$200,000 is deposited on April 19th. A bill will be charged in May for services from April 19th to quarter end June 30th. If a withdrawal were to occur, a rebate would be calculated for fees charged in advance and would be posted during the following calendar month. For client terminations, where advanced notice was given, a rebate will be calculated and posted before termination date, where all services charged in advance would be rebated for the duration of time marked for termination. If a client terminates before a fee is charged, then the fee will be waived. Fees will be self-debited from the account directly under management. 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 Advice Only services within the client agreement charges up to \$1,000 for the delivery of the document 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 postmark 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 advance of services for the quarter. All quarterly bills are calculated and reconciled on the 2nd Wednesday upon the start of the calendar quarter (January, April, July, October), crediting and debiting occurs on the 3rd Wednesday upon the start of the calendar quarter. There is also a monthly arrears billing process to capture fees associated with onboarding and terminations. All monthly arrears billing reconciliation cycles will begin calculations of bills and reconciling on the 2nd Wednesday of every month and then processed on the 3rd Wednesday of every month. From this billing process, clients should expect bills to be charged at the start of every quarter with one bill due no earlier than the second month of service. Due to this, we have a strong rebate policy to ensure that the firm operates with a high degree of integrity and that it adheres to fiduciary obligation. For withdrawals in excess of \$20,000, a rebate will be calculated and posted to the account during the next arrears monthly billing cycle. Rebates are provided promptly when notified of termination and the client should have

reasonable expectations and disclosures from AnalyticEdge on when a rebate should be processed based on the advisor's ability and the timing of notification. Rebates with due notice should occur within 4 business days and would be calculated based on the duration of time between the effective termination date and the date to which services paid in advance covered. As an example, if a client paid for a full quarter (three months) in advance and then requested termination after one month, then two months would be rebated. In the event there is no notification of termination, and the firm no longer has discretionary investment management abilities on accounts, AnalyticEdge Finance will make reasonable efforts to confirm termination before effectuating a termination date as the same date as when discretionary management ceased. When determined that the client terminated without notice, a check made payable to the individual and account registration will be mailed to the address of record in the amount of the calculated rebate. 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 notes, 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

Strategies will be personalized portfolios that 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.

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 presently 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.

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 6 months of firm registration and annually thereafter. The firm does not accept any authority from clients in the capacity as a trustee or account owner.

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 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 second 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

AnalyticEdge Finance does not have other outside business engagements.

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.