

Item 1- Cover Page

SOBORA LLC dba SOBORA Capital

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March 27, 2025

Form ADV, PART 2 (A) Firm Brochure and
Form ADV, PART 2 (B) Brochure Supplement

CRD # 288237

This brochure provides information about the qualifications and business practices of SOBORA LLC dba SOBORA Capital. If you have any questions about the contents of this brochure, please contact us at (510) 759-3637 or by email at info@soboracapital.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.

Registration does not imply any level of skill or training.

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

Item 2 - Material Changes

There is no material changes to our previous annual update dated March 28, 2024.

Within 120 days of our fiscal year end, we will deliver our annual Summary of Material Changes if there have been material changes since the last annual updating amendment.

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Item 4 - Advisory Business

A. Description of Firm

SOBORA LLC dba SOBORA Capital was formed in January 2017, as a limited liability company by Sunday O. Peters to provide investment advisory and asset management services on a non-discretionary basis to individuals, businesses, nonprofits, educational institutions, and governments. SOBORA Capital is owned by Sunday O. Peters.

SOBORA LLC dba SOBORA Capital is registered with the State of California Department of Financial Protection and Innovation in 2017.

SOBORA Capital focuses on asset management, capital markets, financial planning, and consulting with flexibility tailored to the clients' needs. The flexibility of our services allows you, the client, to customize your investments without any obligation to use a specific company or product to meet your investment goals.

SOBORA Capital's services are provided through registered Investment Advisors Representatives (IA). Upon reaching a mutual understanding of SOBORA Capital's scope of services to be provided and fees to be paid by the client, SOBORA Capital's Investment Advisory Agreement is signed by both parties.

SOBORA Capital puts the clients' interests first. Transparency is a cornerstone of our services. SOBORA Capital manages assets on a non-discretionary basis and currently has no asset under management.

B. Description of Advisory Business

1. ASSET MANAGEMENT:

SOBORA Capital provides asset management services and advisories on a non-discretionary basis for individuals, corporations, governments, endowments, pensions, funds, etc. SOBORA Capital will advise, recommend, and/or develop a balanced portfolio following an in-depth analysis of the client's risk tolerance and investment objectives, with special attention to suitability.

Each client has a unique and distinctive investment objective; therefore, an investment policy statement must include customized portfolio restrictions and/or limitations as well as investment goals. A custom portfolio may include, but is not limited to, stocks, bonds, Exchange Traded Funds (ETFs), mutual funds, Real Estate Investment Trusts (REITs), Unit Investment Trusts (UITs), certificates of deposit, and where appropriate, alternative investment vehicles along with full disclosure.

An initial interview and data gathering questionnaire are used to determine the client's financial situation and investment objectives and to provide the client with the opportunity to impose reasonable restrictions on the management of the account. Clients can leave standing instructions with the IA Rep to refrain from investing in particular securities or types of securities or to invest in limited amounts of securities. Clients may call at any time during normal business hours to directly discuss the client's account, financial situation, or investment needs with the IA Rep.

SOBORA Capital may rebalance the portfolio quarterly, where applicable, with client approval if fundamental market changes may affect the clients' investment goals and objectives and/or upon request by clients if their financial situations change.

2. ERISA PLAN INVESTMENT ADVISORY

SOBORA Capital provides advisory and/or consulting services for Employer Sponsored ERISA Plans (Employee Retirement Income Security Act). One of SOBORA Capital's goals is to provide strategic advice that assists clients in meeting their fiduciary responsibilities. The range of advisory services includes, but is not limited to, the following:

- Review of existing plan
- Creation of a new plan
- Plan design and monitoring
- Participant education
- Development of an Investment Policy Statement (IPS)

Upon request, SOBORA Capital will conduct employee education services, including participation on an individual and/or group basis, to inform participants about diverse investment and retirement subjects.

C. Capital Markets

1. PRIVATE PLACEMENT

A private placement is the sale of securities to a small number of select investors to raise capital. In general, the investors involved in private placements are large banks, mutual funds, insurance companies, pension funds, etc. SOBORA Capital does not provide direct funding but will provide advisory services for investor research, funding strategies, i.e., debt vs. equity, crowd funding, etc.

All private placements must meet the statutory requirements of accredited investment in compliance with Regulation D of the Securities Act of 1933.

SOBORA Capital will work with businesses, especially real estate developers, construction and engineering firms, architectural firms, and start-ups, to raise capital through private placement, crowd funding, etc. SOBORA Capital's services include, but are not limited to, investor research, funding sources, capital needs analysis, strategic advice on debt and equity, etc.

Initial consulting is free; however, SOBORA Capital charges a non-refundable retainer fee upon signing the investment advisory fee agreement. The retainer fee covers an operational review of the firm, capital needs analysis, development of marketing strategy, strategic planning about debt vs equity, etc. The fee stipulated in the Investment Advisory Agreement is results-based and is subject to negotiation.

2. PROJECT FINANCING

SOBORA Capital has a specialized advisory practice geared toward engineering firms, construction companies, architects, and real estate developers, especially in sourcing funds for projects, origination, private equity, bridge loans, mezzanine financing, permanent financing, and investment advice regarding acquisitions and dispositions.

- Funding Sources: SOBORA Capital will research and advise on sources of funding for project finance including but not limited to Commercial banks, insurance companies, pension, funds, hedge funds, etc.,
- Construction financing: Advisory on financial strategies with focus on favorable rate and or terms

based on the type of project. Sources of funding includes but not limited to insurance companies, Fannie Mae, Freddie Mac, Pension Funds, Banks, etc.

- Mezzanine Financing: Fill the gap on commercial real estate financing between what commercial banks can lend and the financing real estate developers and construction companies are looking for. Mezzanine financing may cover predevelopment cost, land acquisition, increase leverage by inserting a layer of debt on top of the first mortgage,
- Working Capital: Advisory and develop creative working capital strategies to meet cash flow need of the firm.
- Bridge Financing: Advisory on interim financing solutions based on the need of the client and type of project including capitalizing on new commercial real estate opportunities.
- Permanent Financing: Advisory on long term lending and sources for commercial real estate.
- Debt: funding strategies, analysis and recommendation depending on the capital need of the firms, market capitalization, startup vs established firm, etc.
- Equity: funding strategies, analysis and recommendation depending on the capital need of the firms, market capitalization, startup vs established firm, etc. Analysis and recommendation of the strength and drawback of relinquishing some ownership.
- Acquisition and Disposition: Advisory and assistance in comparative market analysis, price point analysis, due diligence, economic trends & research, etc.

D. Financial Planning and Consulting

SOBORA Capital provides financial planning and consulting services to individuals, businesses, pension administrators, nonprofits, and educational institutions on a fee and/or contract basis. SOBORA Capital will develop a written financial and/or investment plan following an in-depth analysis, including, but not limited to, client investment objectives, risk tolerance, time horizon, liquidity needs, and cash flow needs. SOBORA Capital provides Financial Plans consistent with the individual client's financial and tax status and risk/reward objectives. Planning may be comprehensive or segmented and focus on investments, insurance, taxes, and/or estate plans. SOBORA Capital's relationship with the client begins with an initial fact-finding meeting. SOBORA Capital will advise, recommend, and/or develop a balanced portfolio following an in-depth analysis of the client's risk tolerance and investment objectives, with special attention to suitability.

SOBORA Capital will recommend industry proven benchmarks to track the progress of investment goals.

SOBORA Capital does not verify information provided by the client. Therefore, we recommend the investor client keep us abreast of any changes in lifestyle, i.e., income, marriage, children, etc.

Plan and consulting services are completed within six months, assuming the client provided the information needed by SOBORA Capital to complete its work. The developed financial plan is based on the information provided by the client. Clients reserve the right to reject any part of our recommendations that they do not feel comfortable with or they do not believe meets their investment objectives.

Clients are responsible for implementing or executing the investment plan developed by SOBORA Capital. All services provided by SOBORA Capital are on a non-discretionary basis. Should you want us to manage your account, we must obtain either verbal or written approval from you before conducting any transactions on your behalf.

SOBORA Capital may provide consulting to business owners not involving securities. This is a stand-alone financial consulting billed at an hourly rate. Topics may include but not limited to the following.

- Budgetary Planning
- Business Planning
- Business Succession Planning
- Risk Management
- Insurance Planning
- Investment Analysis

SOBORA Capital may provide one-time financial consulting services to individuals. This is a stand-alone financial consulting billed at an hourly rate. Topics may include but not limited to the following. The consulting services does not include on go going investment advice, asset management and or assistance with execution of securities transaction.

- General Financial Planning
- Cash Flow and Debt Management
- College Savings
- Retirement Planning
- Employee Benefit Optimization
- Insurance Planning
- Estate Planning
- Investment Analysis

SOBORA Capital will provide a written report in print and or electronic format if needed or where applicable. The consulting services does not include on go going investment advice, asset management and or assistance with execution of securities transaction.

The client is under no obligation to act on our recommendation and or implement the plan with SOBORA Capital. However, Should the client request SOBORA Capital to implement the plan, the client will sign a SOBORA Capital Investment Advisory Agreement, and our fees will be billed subject to the asset management fees schedule provided.

At minimum, reviews are conducted once a year and are measured against recognized benchmarks to evaluate desired investment goals.

SOBORA Capital in providing financial planning, a conflict exists between the interests of the investment adviser and the interests of the client, the client is under no obligation to act upon the investment adviser's recommendation, and, if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the investment adviser. This statement is required by California Code of Regulations, 10 CCR Section 260.235.2.

SOBORA Capital is committed to financial literacy in the community we serve through an outreach program at no cost to the participants. On occasion, we will conduct investment workshops independently or in alliance with other firms and/or non-profit organizations. These workshops may include presentations on financial planning strategies, retirement subjects, insurance, etc.

E. Wrap Fee Programs

SOBORA Capital does not participate in Wrap Fee Programs.

Item 5 - Fees and Compensation

A. Asset Management Fees

SOBORA Capital charges a fee based on a percentage of the average value of assets under management per our fee schedule. SOBORA Capital fees do not include any fees charged by custodians, investment managers, broker dealers, wire transfers, electronic funds, securities transaction, trading costs, platform fee, etc. SOBORA Capital does not benefit from any of these charges or fees nor has any sharing agreement with third parties.

SOBORA Capital fees are paid quarterly in advance. The first payment is due and payable upon execution of the Agreement and will be assessed pro-rata in the event the Agreement is executed other than the first day of the new calendar quarter. Subsequent payments are due and will be assessed on the first day of each calendar quarter based on the value of the portfolio as of the last day of the previous calendar quarter.

Payment of fees may be paid direct by the client, or client may authorize the custodian holding client funds and securities to deduct SOBORA Capital advisory fees direct from the client account in accordance with statements prepared and submitted to the custodian by SOBORA Capital. The custodian will provide periodic account statements to the client. SOBORA Capital does not withdraw funds directly from client account to pay for its fees.

SOBORA Capital will send an itemized quarterly invoice to the client at the same time the statement is sent to the custodian that explains our fees and how our fees are calculated based on the assets under management. It is the client's responsibility to verify the accuracy of the fee calculation. The custodian will not determine whether the fee is properly calculated.

SOBORA Capital provides financial planning services at no additional cost to asset management clients.

Schedule of Fees based on the Lehman Formula:

1.25% (125 basis points) on the first \$5 million
1.00% (100 basis points) on the next \$10 million
0.90% (90 basis points) on the next \$60 million
0.75% (75 basis points) on the balance (over \$75 million)

For an ERISA Investment, Advisory SOBORA Capital will negotiate fees with plan sponsors based on the following:

- Number of participants
- Amount under the plan
- Amount of assets under management

Schedule of Fees

- 1.25% for the first \$0 to 5,000,000 in assets.
- 0.80% for the next \$5,000,001 to \$10,000,000 in assets.
- 0.70% for the next 10,000,001 to \$20,000,000 in assets.
- 0.60% for the next \$20,000,001 to \$30,000,000 in assets.
- 0.50% for the next \$30,000,001 and above in assets.

B. Financial Planning and Consulting Fees

- \$150 to \$300 Per Hour - General Financial Planning.
- \$150 to \$300 Per Hour - One-Time Consulting for Business.
- \$150 to \$300 Per Hour - One-Time Financial Consulting for individuals.

Actual fee per hour depends on the complexity of the financial planning and/or consulting services. SOBORA Capital reserves the right to charge fixed fees and adjust the fees up or down subject to negotiation with the client. Flat fee ranges from \$1,000 to \$25,000, depending on the complexity of the task.

Upon signing the SOBORA Capital financial planning agreement, we require a retainer fee of 50% of the agreed fees up front, with the balance to be paid upon delivery of the financial plan; however, we will not require a retainer fee exceeding \$500 if services will not be rendered within six months.

Should the client request SOBORA Capital to implement the plan, the client will sign a SOBORA Capital Investment Advisory Agreement, and our fees will be billed subject to the asset management fees schedule provided.

Clients have the option to pay our fees through the custodian or by direct payment to SOBORA Capital. Said fees do not include custodian fees, i.e., trading costs, administrative fees, 12-1 b fees, etc. SOBORA Capital does not charge a financial planning fee to our asset management clients.

The annual review fee for financial planning is \$500.00.

SOBORA Capital will bill the client for its services and payment is due within 15 days from receipt of invoice.

SOBORA Capital fees are negotiable.

C. Private Placement Fees

An initial one-hour free consultation is available to the client, which covers investor research, an operational review of the firm, a capital needs analysis of the business, terms of our services, etc.

SOBORA Capital charge \$150 to \$300 per hour for a capital need analysis and recommendations of optimal strategies to raise capital, i.e., mix of debt and equity, etc. Depending on the complexity of the request, upon approval by the client, SOBORA Capital may charge an initial fixed fee to evaluate capital needs and to develop a capital formation strategy.

Below is the breakdown of SOBORA Capital fees, which are success-driven based on the Lehman Formula:

10% of the first million: \$100,000; plus
8% of the second million: \$80,000; plus
6% of the third million: \$60,000; plus
4% of the fourth million: \$40,000; plus
2% of the remaining balance

Advisory services like those offered by SOBORA Capital, may be found elsewhere at lower rates.

SOBORA Capital fees are negotiable.

These fees are for advisory services only and do not include any transaction fees or commissions, which may be charged separately by the broker/dealer, custodial firm. See the section heading Brokerage Practices for more information.

D. Project Financing Fees

Below is the breakdown of SOBORA Capital fees, which are success-driven based on the Lehman Formula.

10% of the first million: \$100,000; plus
8% of the second million: \$80,000; plus
6% of the third million: \$60,000; plus
4% of the fourth million: \$40,000; plus
2% of the remaining balance

SOBORA Capital does not guarantee funding through private placement and or project financing; therefore, the client may terminate the agreement without owing any further fees to SOBORA Capital.

E. Other Fees

SOBORA Capital is a fee-only investment advisory firm, and as such neither the advisor or any of its IA Reps will accept compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

F. Termination

Either party can terminate the agreement with a written notice. SOBORA Capital does not charge termination fees. Be advised that custodians may impose termination fees, which are the client's responsibility.

If termination occurs prior to the end of a calendar quarter, the client will be invoiced for fees due on a pro-rata basis. If termination occurs prior to the end of a calendar quarter, a pro-rata refund of unearned fees will be made to the client.

For financial plans, the client may terminate the agreement at any time, and a refund of the unearned fees will be made within 30 days based on the time and effort expended prior to termination. The Agreement for Financial Plans terminates upon delivery of the plan or services.

Clients may terminate the agreement without penalty for a full refund of SOBORA Capital fees within five days of signing the agreement.

Refund will be based on the balance of fees collected in advance minus the hourly rate times the number of hours of work that has been completed up to and including the day of the termination.

The Advisory Agreement contains a pre-dispute arbitration clause. Clients understand that the agreement to arbitrate does not constitute a waiver of the right to seek a judicial forum where such a waiver would be void under the federal securities laws. Arbitration is final and binding on the parties.

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

SOBORA Capital does not engage in or accept performance-based fees, which are defined as the sharing of clients' gains or capital appreciation of their assets.

Item 7 - Types of Clients

SOBORA Capital will manage assets for a diverse client base that includes, but is not limited to, individuals, high net worth individuals, corporations, municipalities, government agencies, small businesses, pension plans, 401 (k) plans, 403 (b) plans, defined benefit plans, trust and estates, charitable institutions, foundations, endowments, educational institutions, banks, and thrift institutions.

Generally, the minimum account size is \$100,000, subject to a minimum annual fee of \$1,000. The minimum fee would increase the maximum percentage rate paid on smaller accounts to more than 1% annualized as shown on the standard fee schedule. However, in no case would the fee exceed 2% per year.

There is no minimum for clients retaining financial planning services.

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

A. Method of Analysis

The analysis utilized include charting, fundamental, technical, and cyclical analysis. SOBORA Capital uses asset allocation strategies for portfolio management. SOBORA Capital will utilize various third-party vendors as information sources for its analysis and/or research, i.e., Bloomberg, S&P, Moody's, Morning Star, Kiplinger, etc. Research and analysis encompass a sector analysis, company analysis, industry analysis, economic trends, SEC filings, i.e., 10K's, 10Q, etc.

SOBORA Capital has a responsibility upon being retained to work with the clients to determine their investment objectives, risk tolerance, and time horizon and to develop an investment strategy that addresses risk vs. reward for clients. SOBORA Capital does not guarantee that clients will achieve their desired investment goals or objectives.

SOBORA Capital will educate the client regarding the recommended investment strategies, fees, costs, etc.; however, clients bear both the risks of loss associated with investing in securities and reap the enjoyment of benefits from their gains. For investments sold by prospectus, clients should read the prospectus in full. SOBORA Capital strongly recommends a diversified portfolio of client investments.

Investing in securities involves risk of loss that clients should be prepared to bear.

B. Risk of Loss

The following discussion includes some, though not all, risks associated with investing in the securities market.

Currency Risk: This is the potential risk of loss from fluctuating foreign exchange rates. This type of risk affects investors who invest overseas or have exposure to foreign currency or foreign currency traded investments and/or securities. This type of risk is also referred to as an exchange rate risk.

Interest Rate Risk: This risk affects bond owners from fluctuating interest rates. There is an inverse relationship between the yields on bonds and interest rates. When interest falls, bond prices rise, and when interest rates rise, bond prices fall.

Investment Risk: This refers to the probability of losses occurring relative to the expected return on a specific investment. All investments carry an element of risk that affects stocks, bonds, mutual funds, Exchange Traded Funds, etc. Therefore, the current performance of a specific investment is not a guarantee of future performance.

Inflation Risk: This is also known as purchasing power risk, and it is the probability that cash flow from an investment will not be worth as much in the future due to changes in purchasing power caused by inflation. Another way to describe inflation risk is that a dollar today will not buy the same amount of goods next year due to inflation.

Legislative Risk: This is the possibility of sustaining a loss due to changes in government actions. For example, the changes in tax and investment laws may affect returns from investments.

Liquidity Risk: This is the ability of a company to convert assets into cash. For example, real estate is considered an illiquid asset because of the length of time required to close transactions in escrow; however, money markets accounts are highly liquid. Therefore, when a company cannot meet short-term financial needs due to its inability to convert investments into cash that is a risk.

Market Risk: This is the risk that the value of investments may decrease due to external factors that affect the entire financial market. Some causes of market risk include, but are not limited to, political turmoil, changes in interest rates, terrorist attacks, recessions, etc. Market risk is sometimes referred to as a systematic risk that cannot be eliminated through the diversification of an investment portfolio.

Item 9 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SOBORA Capital or the integrity of SOBORA Capital's management. We have no information or disclosures applicable to this Item.

Any such information would be available upon request and would also be publicly accessible by selecting the investment advisor search option at <http://www.adviserinfo.sec.gov>.

Item 10 - Other Financial Industry Activities and Affiliations

- A. Sunday O. Peters has a California Real Estate Brokers license with SOBORA, Inc. dba SOBORA, Mortgage, SOBORA Capital Markets, SOBORA Real Estate and will provide mortgage and real estate services.

SOBORA Capital does not have an application pending to register as a broker-dealer or a registered representative of a broker-dealer. Sunday O. Peters may register in the future as a Registered Representative with a Broker-Dealer.

- B. SOBORA Capital does not have an application pending to register as a future commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of these entities.
- C. SOBORA Capital is a fee-only investment advisory firm, and as such neither the advisor or any of its IA Reps will accept commissions or other compensation for the implementation of the portfolio. While Sunday O Peters is a California Licensed Real Estate Broker with SOBORA, Inc. dba SOBORA Real Estate if a conflict of interest exists, the client is under no obligation to utilize the services of Sunday O Peters for real estate services.

SOBORA Capital is a fee-only investment advisory firm, and as such, neither the advisor nor any of its IA Reps will accept commissions or other compensation for the implementation of the portfolio. While Sunday O Peters has MLO License Endorsement by the California Department of Real Estate with SOBORA, Inc. dba SOBORA Mortgage, SOBORA Capital Markets, and will provide mortgage services. If a conflict of interest exists, the client is under no obligation to utilize the services of Sunday O. Peters for mortgage services.

SOBORA Capital is a fee-only investment advisory firm, and as such neither the advisor or any of its IA Reps will accept commissions or other compensation for the implementation of the portfolio. Sunday O Peters is a California Licensed Insurance Agent with dba SOBORA Insurance Solutions and may offer insurance products. If clients purchase these products through Sunday O Peters, he will receive normal commissions. If conflict of interest exists, the client is under no obligation to utilize the services of Sunday O Peters for insurance services.

- D. On an as-needed basis or at the request of the client, SOBORA Capital may refer other professionals to provide specific services to clients that are outside of our investment advisory agreement. Fees and/or the scope of services will be negotiated between the client and the professional and/or entity. SOBORA Capital does not have any referral arrangement with these professionals or entities, nor will SOBORA Capital share any fees with them. Professionals and/or entities may include, but are not limited to, broker-dealers, attorneys, other investment advisors or financial planners, banking or thrift institutions, accountant or accounting firms, insurance companies or agents, pension consultants, limited partnerships, etc.

SOBORA Capital will ensure that the other advisers are properly licensed and registered as an investment adviser prior to recommending other adviser to clients.

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

SOBORA Capital maintains a Code of Ethics. The Code of Ethics sets forth standards of conduct expected of advisory personnel, requires compliance with federal securities laws, and addresses conflicts that arise from personal trading through advisory personnel. Clients may request a copy of the Code of Ethics. As an investment advisory firm, SOBORA Capital has a fiduciary responsibility to clients to be transparent, honest, fair, and professional. SOBORA Capital provides investment advisory services on a non-discretionary basis and will only work with clients after receiving a written agreement and/or approval by the client.

A. Personal Trading

At times, SOBORA Capital and/or its IA Reps may take positions in the same securities as clients, and we will try to avoid conflicts with clients. The firm and its IA Reps will generally be “last in” and “last out” for the trading day when trading occurs near client trades. We will not violate our fiduciary responsibilities to our clients. Scalping (trading shortly ahead of clients) is prohibited. Should a conflict occur due to materiality (i.e., a thinly traded stock), a disclosure will be made to the client(s) at the time of trading. Incidental trading not deemed to be a conflict (i.e., a purchase or sale that is minimal in relation to the total outstanding value and as such would have a negligible effect on the market price) would not be disclosed at the time of trading.

B. Participation of Interest in Client Transactions

SOBORA Capital does not recommend that clients buy or sell securities in which a related person to SOBORA Capital or SOBORA Capital has a material financial interest.

Item 12 - Brokerage Practices

SOBORA Capital recommends clients maintain investment management account with custodians and/or registered broker-dealers such as Charles Schwab, TD Ameritrade, Fidelity, etc., a member of the Financial Industry Regulatory Authority (“FINRA”), the Securities Investor Protection Corporation (“SIPC”). SOBORA Capital is an independent firm and is not affiliated with these companies and does not receive any commission from recommending them.

A. Research and Other Benefits:

SOBORA Capital in performing analysis and making investment decisions may receive from custodians and or broker dealers research services, software, trading support, pricing information, market commentaries, portfolio evaluation analysis, data analysis, etc.

Additionally, SOBORA Capital may receive benefits from custodians, broker-dealers, third party firms consulting services on practice management, regulatory compliance, publications, marketing, conferences, administrative back-office account services, performance evaluation, technology, etc.

SOBORA Capital understands its duty for best execution and considers all factors in making recommendations to clients. These research services may be useful in servicing all SOBORA Capital clients and may not be used in connection with any particular account that may have paid compensation to the firm providing such services. While SOBORA Capital may not always obtain the lowest commission rate, SOBORA Capital believes the rate is reasonable in relation to the value of the custody, brokerage and research services provided.

SOBORA Capital does not participate or utilize Soft Dollar transactions or services, where a client commission is used to purchase research and educational services. SOBORA Capital is a fee-only investment advisory firm, and as such neither the advisor or any of its IA Reps will accept commissions.

B. Directed Brokerage

Client may direct brokerage to a specified broker-dealer other than the firm recommended by SOBORA Capital. It is up to the client to negotiate the commission rate, as SOBORA Capital will not. The client may not be able to negotiate the most competitive rate. As a result, the client may pay more than the rate available through the broker-dealer used by SOBORA Capital. Where the client does not otherwise

designate a broker dealer, SOBORA Capital recommends a broker-dealer with competitive commission rates.

Note in client directed brokerage arrangements, the client may not be able to participate in aggregated (“blocked”) trades, which may help reduce the cost of execution.

C. Trade Aggregation

SOBORA Capital do not aggregate orders. Therefore, the client may pay higher brokerage commissions and may not be able to aggregate orders to reduce transaction costs, or the client may receive less favorable prices.

Item 13 - Review of Accounts and Reports on Accounts

SOBORA Capital will review a client’s account annually to determine if it meets and/or exceeds written documented investment goals and objectives or if there are any changes in investment strategy, risk tolerance, etc. Market conditions that might cause a wide variance in the specified asset allocation or other factors could trigger an early review.

Sunday O. Peters Principal & Chief Compliance Officer reviews the accounts, monitor the portfolios and financial plans for investment objectives.

All clients will receive standard account statements from investment sponsors and brokerage firms.

Clients will receive a written quarterly performance report from SOBORA Capital.

Item 14 - Client Referrals and Other Compensation

SOBORA Capital has no arrangement to pay any individual or party for client acquisition. SOBORA Capital does not directly or indirectly compensate individuals for client referrals.

Item 15 - Custody

SOBORA Capital does not maintain custody of clients’ accounts and/or assets other than to deduct management fees from clients’ accounts if approved by the client. Clients appoint a custodian that holds and maintains clients' investment assets and receives monthly statements from the custodian (Charles Schwab & Co is our primary custodian).

Clients are urged to compare custodial account statements against statements prepared by SOBORA Capital for accuracy. Minor variations may occur due to reporting dates, accrual methods of interest and dividends, and other factors. The custodial statement is the official record of a client’s account for tax purposes.

Item 16 - Investment Discretion

SOBORA Capital’s investment advisory services are offered on a non-discretionary basis, and it does not have discretion over any client accounts.

SOBORA Capital will secure the client’s permission prior to effecting securities transactions in client accounts managed on a non-discretionary basis pursuant to California Code of Regulation, Section 260.237.2(f)(1).

Item 17 - Voting Client Securities

SOBORA Capital does not vote proxies on behalf of clients. It is the client's responsibility to vote their own proxies on all securities in the portfolio. Clients will receive proxy materials directly from the custodian and/or responsible third party. Inquiries regarding proxies may be made via the contact information on the cover page.

Item 18 - Financial Information

As a registered investment advisor, SOBORA Capital is required to provide clients with certain financial information and disclosures about SOBORA Capital's financial condition. A balance sheet is not required to be provided because SOBORA Capital does not require prepayment of fees of more than \$500 per client or six months or more in advance. In addition, SOBORA Capital has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and it has not been the subject of a bankruptcy proceeding.

Item 19 - Requirements for State Registered Advisors

A. Educational Background and Business Experience

Sunday O. Peters, Principal
Year of Birth: 1962

Education:

- Masters of Public Administration, San Francisco State University, 1994
- Bachelors of Liberal Arts, Antioch University West, 1987
- Bachelors of Business Administration (Magna Cum Laude), Lincoln University, 1987

Security Examinations: FINRA (Formerly NASD)

- Series 7, 12/12/2001
- Series 63, 01/11/2012
- Series 65, 11/01/2014

Relevant Business Experience:

- 2022 to Present, Founder & Broker of Record, SOBORA, Inc.
- 2017 to Present: Principal SOBORA LLC dba SOBORA Capital
- 2016 to Present: Founder & Real Estate Broker of Record: SOBORA
- 2010 to 2015: Founder & Real Estate Broker of Record General Portfolio Ltd.
- 2014 to 2015: Registered & Investment Advisor Representative Transamerica Financial Advisors

B. Sunday O. Peters has a California Real Estate Brokers license with SOBORA, Inc dba. SOBORA Mortgage, SOBORA Capital Markets, SOBORA Real Estate and will provide mortgage and real estate services.

Sunday O. Peters has a California Licensed Insurance Agent and may provide insurance services.

- C. SOBORA Capital does not receive performance-based fees, except those fees described in response to Item 5 of Part 2A. Performance-based fees are defined as the sharing of clients' gains or capital appreciation of their assets.
- D. Sunday O. Peters has not been involved in any arbitration claims or any civil, self-regulatory organization, or administrative proceedings involving investment advisory business or activities applicable to this item. Sunday O. Peters has not been the subject of a bankruptcy petition.
- E. Sunday O. Peters does not have any relationships or arrangements with issuers of securities not listed in item 10C of Part 2A.

Item 20 - Business Continuity Plan:

SOBORA Capital is committed to safeguarding the interest of our clients in the event of an emergency or Significant Business Disruption (SBD).

In the case of emergency or Significant Business Disruption (SBD), SOBORA Capital will secure a temporary location and begin to contact our clients within 24 to 48 hours depending on the nature of the emergency and or significant business disruption.

Emergency Contact Person:

Sunday O Peters, Principal & Chief Compliance Officer
510-759-3637

Email: info@soboracapital.com

Alternate Number: 800-7605-1535

Alternate Email: sundaypeters@msn.com

SOBORA Capital does not maintain custody of customers' funds or securities, which are with the client custodian and or broker dealer. However, we will assist clients, in the event of an SBD, to access their assets at the broker dealer and or custodian that have custody of the assets. In the case of an external SBD, SOBORA Capital ability to assist clients depend on the availability of electricity, telephones, internet, etc.
Custodian Name: To Be Determined (TBD)

Address: TBD

Phone: TBD

Email: TBD

Fax: TBD

Broker Dealer Name: To Be Determined (TBD)

Address: TBD

Phone: TBD

Email: TBD

Fax: TBD

SOBORA Capital is committed to testing and updating our Business Continuity Plan to serve you the client.

Item 1 - Cover Page

Form ADV Part 2B
CRD # 4460493

Brochure Supplement

March 28, 2023

This Brochure Supplement provides information about Sunday O. Peters that supplements the SOBORA LLC dba SOBORA Capital brochure Form ADV Part 2A. You should have received a copy of the brochure. Please contact Sunday O. Peters at 510-759-3637 or by email at info@soboracapital.com if you did not receive SOBORA Capital's brochure or if you have any questions about the contents of this supplement.

Additional information about Sunday O. Peters is available on the SEC's website at:
www.adviserinfo.sec.gov.

SOBORA LLC dba SOBORA Capital
4900 Hopyard Road Suite 100
Pleasanton, CA 94588
510-759- 3637, 800-705-1535

Sunday O. Peters, Principal
Year of Birth: 1962

Item 2 - Educational Background and Business Experience

Education:

- Master of Public Administration, San Francisco State University, 1994
- Bachelor of Liberal Arts, Antioch University West, 1987
- Bachelor of Business Administration (Magna Cum Laude), Lincoln University, 1987

Security Examinations: FINRA (Formerly NASD)

- Series 7, 12/12/2001
- Series 63, 01/11/2012
- Series 65, 11/01/2014

Business Experience:

- 2022 to Present: Founder & Broker of Record: SOBORA, Inc.
- 2017 to Present: Principal SOBORA LLC dba SOBORA Capital
- 2016 to Present: Founder & Real Estate Broker of Record: SOBORA
- 2010 to 2015: Founder & Real Estate Broker of Record General Portfolio Ltd.
- 2014 to 2015: Registered & Investment Advisors Representative Transamerica Financial Advisors

Item 3 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of SOBORA Capital or the integrity of SOBORA Capital's management. We have no information or disclosures applicable to this Item.

Item 4 - Other Business Activities

Sunday O. Peters has a California Real Estate Brokers license with SOBORA, Inc. dba SOBORA Real Estate, SOBORA Mortgage and SOBORA Capital Markets, and will provide mortgage and real estate services.

Sunday O. Peters is a California Licensed Insurance Agent with dba SOBORA Insurance Solutions and may provide insurance services.

Item 5 - Additional Compensation

SOBORA Capital and/or its personnel do not receive additional compensation in providing investment advice.

Item 6 - Supervision

Sunday O. Peters is the Principal & Chief Compliance Officer. As such, Sunday O. Peters is responsible for all advice provided to clients.

Item 7 - Requirements for State-Registered Advisors

Sunday O. Peters has not been involved in any arbitration proceedings.

Sunday O. Peters has not been involved in any civil, self-regulatory organization, or administrative proceedings.

Sunday O. Peters has not been the subject of a bankruptcy petition.