Form ADV Part 2A Firm Brochure

ITEM 1 COVER PAGE

Halo Capital Management LLC
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Phone: 703-873-7591
Website: https://halocap.com

Date of Brochure: March 15, 2021

This brochure provides information about the qualifications and business practices of Halo Capital Management LLC. If you have any questions about the contents of this brochure, please contact us at 703-873-7591 or rjha@halocap.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. Additional information about Halo Capital Management LLC is also available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Halo Capital Management LLC is 154898. The registration of "registered investment adviser" does not imply a certain level of skill or training.

ITEM 2 MATERIAL CHANGES

There are no material changes to the brochure since its last update on December 15, 2020.

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ITEM 4 ADVISORY BUSINESS

A. Halo Capital Management LLC ("the Adviser") is a Limited Liability Company, incorporated in the State of Virginia in 2010. The managing member of Halo Capital Management, LLC is Rajesh Jha, who is also its sole member.

B. The Adviser offers discretionary asset management services to clients. The client authorizes the Adviser discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement. As of March 15, 2021, the Adviser has $32,350,000 under discretionary asset management services. The Adviser has $690,000 assets under non-discretionary asset management services.

C. The Adviser does not take clients' instructions to purchase or not to purchase specific securities. However, clients may impose restrictions from purchasing specific security symbols through setting of their brokerage accounts, and it is the responsibility of clients to work with brokerage to ensure the restriction is properly enforced. However, at the Adviser's discretion, the Adviser may tailor customized portfolios of different objectives for the needs of individual investors, high net worth clients or institutions.

ITEM 5 FEE AND COMPENSATION

A. (1) Asset Management Fee: For individual clients, the Adviser is directly compensated by the fee from clients for a percentage of assets under management for using the Adviser's portfolios. Fees are based on a percentage of Assets Under Management, **defined as net market value of the account**, under the following schedule:

Assets Under Management	Annual Fee	Quarterly Fee
Up to $1,000,000	1.50%	0.37%
$1,000,001 - $2,500,000	1.00%	0.25%
$2,500,001 - $5,000,000	0.75%	0.18%
Over $5,000,001	0.50%	0.125%

The Fee may be negotiable on a case-by-case basis. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of each quarter. Quarterly advisory fees are deducted from the clients' account by the custodian and is reflected in a provided fee invoice as fees are withdrawn. Clients may terminate their account within five business days of signing the Investment Advisory Agreement for a full refund. Clients may terminate advisory services with 30 days written notice. The Adviser is entitled to a pro rata fee for the days service was provided in the final quarter.

Additional expenses may be incurred if third-party managed products are held in a portfolio. For example, exchange traded funds, mutual funds and closed-ended funds have various management and administrative fees related to them. The fees charged by the Adviser are in addition to all fees charged at the product level.

Fixed Fees: Fixed fees for our advisory services range from $250 to $10,000, are negotiable depending upon the complexity and scope of advisory services, client's specific financial situation and objectives. An estimate of the total time/cost will be determined at the start of the advisory relationship. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, we will notify the client and request that they approve the additional fee. At Advisor's discretion, the Fixed Fee may be waived if an Asset Management Fee is charged to the same client.

(2) Performance Fees: The Adviser accepts "qualified clients" only under Rule 205-3 of US Investment Advisers Act of 1940. "Qualified clients" are those clients who have at least **$1,000,000** invested with the Adviser or have a net worth of more than **$2,100,000** at the time of entering into the Investment Advisory Agreement. The advisory service fee for "qualified clients" portfolios includes Asset Management Fee and Performance Fee. Asset Management Fee for "qualified clients" ranges from annualized rate of 0.25% to 0.50% of net assets under management, and Performance Fee ranges from 20% to 25% of net realized and unrealized gain, and applied on a quarterly basis, starting with the account funding date. The net realized and unrealized gain is calculated by subtracting the beginning of the period (1st day of calendar quarter or new account's funding date) account value from the end of the period (last day of calendar quarter or termination date) account value and then subtracting any net cash inflow (deposits minus withdrawals) during the period. For any account that is funded after the first day of the calendar quarter or terminated before the end of the calendar

quarter, the Performance Fee is calculated pro-rata. If a negative performance is recorded during the period, this reduction in value shall first be recovered during the following quarters before the account can be charged its next Performance Fee. If a negative Performance is recorded for a period or if Performance fee is not earned for the period due to previous period negative performance, the account will be charged only its Asset Management Fee. The specific terms of the Performance Fee will be memorialized in client's advisory agreement. The advisory service fee for the "qualified clients" is not negotiable, but the Adviser does offer exception under special circumstances.

B. The Adviser does not allow supervised persons to take fee payment in advance from clients. Violation of supervised persons could result in immediate termination, and all advanced payments will be refunded to clients upon discovery.

C. The Adviser believes product sales commission presents a conflict of interests for clients' investment portfolios. Although, the Adviser does not engage in product sales that result in commission compensation, its member, Rajesh Jha, is also licensed as an insurance agent, and from time to time, he may service clients seeking advice on life insurance and fixed annuity products. Products, such as insurance, fixed annuities etc. that provide an upfront commission to the agent incentivize the supervised person to recommend investment products based on the compensation received, rather than on a client's needs. Clients have the option to purchase investment or insurance products that we recommend through other brokers or agents that are not affiliated with us.

ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

In addition to portfolios managed for regular individual clients, the Adviser accepts "qualified clients" under Rule 205-3 of US Investment Advisers Act of 1940 for certain customized portfolios or investment strategies. For these clients, the Adviser charges performance-based fees, that is, fees based on a share of capital gain on or capital appreciation of the assets of a client. This performance fee arrangement creates an incentive for us to develop strategies to produce superior returns and get compensated for the effort to constantly monitor "qualified clients" accounts and identify future investment opportunities. Except under certain circumstances at the sole discretion of the Adviser, the Adviser does not provide hedging in portfolios managed for regular individual clients, because the risk and complexity of hedging cannot be explained easily to regular individual clients and the regular fee structure without performance-based fee does not justify the effort required for hedging.

The Adviser manages accounts that are charged performance-based fees while at the same time managing accounts, often with similar objectives that are not charged performance-based fees ("side-by-side management"). Because the Adviser may receive increased compensation with regard to unrealized appreciation as well as realized gains in the "qualified clients" accounts, the Adviser may face the conflicts of interest when managing accounts with and without performance-based fees at the same time, such as having an incentive to favor accounts that the Adviser receives a performance-based fee. To avoid such conflicts of interest, the Adviser regularly monitors and ensures that the investments in "qualified clients" accounts are not identical to the ones in regular client accounts.

Performance-based fee arrangement may create an incentive for our firm to make investments that are riskier or more speculative than would be the case in the absence of a performance fee. In order to address this potential conflict of interest, the Advisor periodically reviews client accounts to ensure that investments are suitable and that the account is being managed according to the client's investment objectives and risk tolerance.

The advisor may receive increased compensation with regard to unrealized appreciation as well as realized gains in the client's account. The investment performance is measured, and performance fees calculated per calendar quarter, throughout the term of the contract, which may encourage more than usual frequency of trades and create potential conflicts with respect to allocation of investment opportunities among clients. To address this conflict of interest, the Advisor periodically monitors and ensures that we allocate investment opportunities per client's objectives and risk tolerance, with an effort to avoid favoritism among our clients, regardless of whether the client is charged performance fees.

ITEM 7 TYPE OF CLIENTS

The Adviser provides investment adviser service to individuals, high net-worth individuals, pension and profit-sharing plans. The Adviser plans to offer investment adviser service to other types of institutional investors in the future.

For individual clients, $300,000 is the minimum asset amount to utilize advisory service.

For “qualified clients”, $500,000 is the minimum asset amount to receive portfolio management with performance fee. "Qualified clients" are those clients who have at least $1,000,000 invested with the Adviser or have a net worth of more than $2,100,000 at the time of entering into an agreement.

The minimum asset amount is negotiable on a case-by-case basis.

ITEM 8 METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Investing in the financial markets involves risk, including the risk of principal loss. Do not invest money you can't afford to lose. Information expressed here is in no way intended as personalized investment advice or solicitation and should not be interpreted as such. Past performance is not necessarily indicative of future results. Performance results do not take into account any tax consequences.

All new client relationships include an investment policy statement (IPS) as part of the Investment Advisory Agreement. This policy is based upon an in-depth evaluation of clients' financial goals, objectives, and risk tolerance. Risk tolerance is assessed using our firm's risk tolerance questionnaire. For existing clients, a follow up risk assessment is recommended if circumstances or their financial status changes.

The investment policy statement specifies a targeted asset allocation. A customized portfolio suitable for the allocation is constructed to each account using mutual funds or Exchange Traded Funds (ETFs) to allow for adequate diversification and risk control. We avoid attempting to time market movements. Our core philosophy is to maintain a strategic allocation portfolio based on client objective and risk tolerance. However, it is acceptable, if the client concurs, to tactically allocate a predetermined percentage to enable the client to take advantage of potential interim investment opportunities. Legacy holdings in new accounts transferred in are typically liquidated immediately. If there are circumstances that make this impractical, or at your client request, we develop a plan to eventually eliminate these positions.

To develop customized portfolios, we employ extensive research and analysis to determine the overall asset allocation, sector weightings, and individual security holdings. The overriding objectives in all our investment models are diversification and liquidity to control risk. We use only marketable stocks, bonds, Exchange Traded Funds (ETFs), and no-load mutual funds to construct our portfolios. The broad strategy is based upon asset allocation foremost so that no individual security will have a major impact on the overall performance. The balance between equity securities and fixed income is the primary factor to control portfolio risk and volatility. We assign equity sector and class weightings based upon our analysis of the marketplace, economic factors, and judgment on where the best opportunities for return verses risk might be. We assign a higher overall percentage of our portfolios to segments of the market we feel are underpriced relative to the potential performance and risk, and underweight segments we conclude have excessive valuations and risk. ETFs and mutual funds selected for our portfolios are based on our analysis, numerous external research sources, and their contribution to the overall investment strategy. Individual stocks, if selected, are based on fundamental analysis approach, which includes extensive research of financial data, products and services, markets and competitors, management capabilities and economic cycle trends, just to name a few factors.

Mutual funds and Exchange Traded Funds (ETFs) are pools of securities so diversification is inherent in their structure. Therefore, our analysis typically focuses on the investment strategy, expense ratios, and overall performance relative to similar offerings in the marketplace. ETFs are similar to indexed mutual funds but trade anytime during the day at the market price, just as an individual stock would. The indexes they track can be based upon a broad market, sector, region, industry etc. ETFs are structured to be tax efficient and offer low expense ratios. We use them extensively in the construction of most of our portfolios.

While our overall asset allocation strategy is designed to control risk and market volatility, it is not possible to eliminate it entirely. Therefore, even the most conservative asset allocation will be subject to the risk of loss. Past performance is not a guarantee of future results. Investment involves risk of loss of principal. Risk of loss diminishes the longer the investment time horizon.

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 Halo Capital Management LLC or the integrity of its management. Currently there is no legal or disciplinary action against Halo Capital Management LLC, its management, or its supervised persons.

ITEM 10 OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. The Adviser or any of its management persons is not registered as a broker-dealer and is not a registered representative of a broker-dealer.

B. The Adviser or any of its management persons is not registered as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. The Adviser does not recommend or select other investment advisers for clients in order to receive compensation for the referral.

D. Member Rajesh Jha is also licensed as an insurance agent. From time to time, he may offer clients advice or products related to those activities. Clients are not required to purchase any products.

ITEM 11 CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

The Adviser has a written code of ethics that requires the firm to place the clients' interests above the firm or any employee's interests. It charges fair fees based on the unique client scenario, required time and utilized skills. It conducts all client dealings to uphold required laws and regulations. The firm provides the same level of service to each client as it would expect in the same circumstances. A complete copy of its code of ethics is available upon request.

The Adviser or individuals associated with the firm, may buy or sell, for their personal account(s), investment products identical to those recommended to clients. It is the express policy of the Adviser that no person employed by the firm may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts, as these situations represent a conflict of interest.

The Adviser has established the following restrictions in order to ensure its fiduciary responsibilities:

1. Associated persons, or their immediate family members shall not buy or sell securities for their personal portfolio(s) where their decision is derived in whole or in part, by reason of the associated person's employment, unless the information is also available to the investing public on reasonable inquiry. No associated person of the firm shall prefer his or her own interest to that of the advisory client.

2. The Adviser maintains records of all securities bought or sold by the firm, associated persons of the firm, and related entities. The Adviser reviews these records on a regular basis.

3. The Adviser requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practice.

4. Any individual not in observance of the above may be subject to termination.

ITEM 12 BROKERAGE PRACTICES

The Adviser's Investment Advisory Agreement grants the Advisor discretionary direct asset management services to advisory clients. The Adviser directs the custodian to invest and reinvest or sell and otherwise dispose of the account assets in common and preferred stocks, bonds, debentures, mortgages, notes, mutual fund shares, exchange traded funds, options, and real estate investment trusts. The Adviser directs the custodian to exercise or abstain from exercising any options, privileges or rights held as part of the account. The Adviser does not receive any benefit from custodian other than execution of client transactions.

The Adviser will use block trades where possible and when advantageous to clients. The blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts, so long as transaction costs are shared equally and on a pro-rata basis between all accounts included in any such block. Block trading may allow us to execute equity trades in a timelier, more equitable manner, at an average share price.

The Adviser recommends the use of a particular broker-dealer to serve as custodian or utilizes a broker-dealer of the client's choosing. Clients are not required to use Advisor recommended custodian. The Adviser selects appropriate brokers based on a number of factors including but not limited to their efficient transaction execution capability, ability to aggregate orders and relatively low transaction fees. The Adviser relies on the custodian to provide its execution services at the best prices available. Clients may pay commissions higher than those attainable from other brokers. Clients pay for any and all custodial fees in addition to the advisory fee charged by the Adviser.

DIRECTED BROKERAGE

The Adviser recommends that clients direct the Adviser to execute transactions through its custodians. As such, the Adviser may be unable to achieve the most favorable execution of client's transactions and client's may pay higher brokerage commissions than they might otherwise pay through another broker-dealer that offers the same types of services.

In limited circumstances, and at Adviser's discretion, some clients may instruct the Adviser to use one or more particular brokers for the transactions in their accounts. If a client chooses to direct the Adviser to use a particular broker, they should understand that this might prevent the Adviser from aggregating trades with other client accounts. This practice may also prevent the Adviser from obtaining favorable net price and execution. Thus, when directing brokerage business, clients should consider whether the commission expenses, execution, clearance, and settlement capabilities that they will obtain through the broker of their choice are adequately favorable in comparison to those that the Adviser would otherwise obtain for them.

ITEM 13 REVIEW OF ACCOUNTS

A. Client accounts are reviewed at least monthly for consistency with clients' investment policy. Rajesh Jha, President and CEO of the Adviser, performs reviews of all investment advisory accounts.

B. The Adviser typically reviews client accounts on weekly basis to ensure accounts' performance is consistent with clients' investment policy.

C. Brokerage statements are sent directly from the brokerage firm, typically in electronics format, and are typically sent monthly. The statements list the account positions, account activity, and other related information. Clients are also sent confirmations following each brokerage account transaction unless confirmations have been waived.

ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION

A. The Adviser and its supervised persons do not have any arrangements, oral or in writing, where it is paid cash by or receives some economic benefit (including commissions, equipment or other services) from a non-client in connection with giving advice to clients.

B. The Adviser and its supervised persons do not directly or indirectly compensate any person for client referrals. The Adviser does not use solicitors.

ITEM 15 CUSTODY

The Adviser does not have custody of client accounts, and it does not allow supervised persons to take custody of clients' funds. However, the Adviser is deemed to have custody of client assets through the debiting of fees from client accounts.

Custody of client accounts will be held at independent brokerage firms that serve as qualified custodians. The adviser has written authorization from the client to deduct advisory fees from the account held with the qualified custodian.

As part of the billing process, the client's qualified custodian is provided with the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send a statement showing all transactions within the account during the reporting period, including the amount of any Adviser's fees debited from the client's account.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact the Adviser directly if they believe that there may be an error in their statement.

In addition to the statements that clients receive directly from their custodians, the Adviser also sends a Billing Summary directly to its clients on a quarterly basis. The Billing Summary itemizes the fee including the formula used to calculate the fee, the amount of assets under management upon which the fee is based, and the time period covered by the fee.   We urge our clients to carefully compare the information provided on the Billing Summary with the statement sent to them by their qualified custodian.

Custody of client accounts will be held at independent brokerage firms.

ITEM 16 INVESTMENT DISCRETION

Clients will complete an investment advisory agreement with the Adviser, and the investment advisory agreement does not give the Adviser the authority to withdraw funds or securities from client accounts.

The agreement only gives the Adviser discretionary trading authorization and power of attorney to buy and sell securities in client accounts, to receive account statements, and to have brokerage calculate and deduct agreed upon advisory service fee. This agreement sets forth the authorization of us to determine, without obtaining specific client consent, the securities to be bought and sold and the amount of securities to be bought and sold. The Adviser determines buy and sell decision of investments in client accounts.

Clients give the Adviser discretionary authority when they sign the Investment Advisory Agreement with the Adviser. Clients can limit the discretionary authority by giving us written instructions, and may change or amend such limitations by once again providing us with written instructions.

ITEM 17 VOTING CLIENT SECURITIES

A. The Adviser will not have or accept authority to exercise power with respect to client securities. The Adviser will not vote proxies on behalf of clients.

B. Clients will receive their proxies or other solicitations directly from their brokerage firm or a transfer agent. The Adviser does not offer opinion on proxies or solicitations. All of securities held in portfolios are determined by objective valuation methods, and the Adviser never makes buy or sell decisions based on proxies or solicitations.

ITEM 18 FINANCIAL INFORMATION

A. The Adviser does not allow prepayment of advisory service fee, and does not allow supervised persons to take fee payment in advance from any client.

B. The Adviser and its supervised persons have discretionary trading authorization but do not have custody of client funds or securities.

C. The Adviser has never been the subject of a bankruptcy petition at any time during the past ten years.

ITEM 19 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

A. Education and Business Background of principal executive officer of the Adviser:

Name: Rajesh Jha
Year of Birth: 1970

Education Background:
1998 University of Maryland at College Park, MBA
1995 University of Maryland at College Park, MS

Business Background:
08/2010 - Present Halo Capital Management, LLC, Member/IAR

B. The main business activities of the Adviser are managing investment portfolios and providing investment advice. The Adviser spends about 100% of its time on the investment management business.

C. Performance fee calculation method is described in item 5A(2). Performance-based compensation may create an incentive for the Adviser to recommend an investment that may carry a higher degree of risk to the client.

D. The Adviser or any of its management persons has not been found liable in an arbitration claim or in a civil, self-regulatory organization, or administrative proceeding.

E. The Adviser or its management team does not have any relationship or arrangement with any issuer of securities.

Form ADV Part 2B Brochure Supplement

ITEM 1 COVER PAGE

Rajesh Jha
Halo Capital Management LLC
4000 Legato Road, Suite 1100
Fairfax, VA 22033
Phone: 703-873-7591

Date of Supplement: March 15, 2021

This Brochure Supplement provides information about Rajesh Jha that supplements Halo Capital Management LLC's brochure. You should have received a copy of that brochure. Please contact Rajesh Jha if you did not receive Halo Capital Management LLC's brochure or if you have any questions about the contents of this supplement. Additional information about Rajesh Jha is also available on the SEC's website at www.adviserinfo.sec.gov.

ITEM 2 EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Rajesh Jha
Year of Birth: 1970

Education Background:
1998 University of Maryland at College Park, MBA
1995 University of Maryland at College Park, MS

Business Background:
08/2010 - Present Halo Capital Management, LLC Member/IAR

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 each supervised person providing investment advice. No information is applicable to this Item for Rajesh Jha.

ITEM 4 OTHER BUSINESS ACTIVITIES

Rajesh Jha spends 100 percent of his time in the business of Halo Capital Management LLC. Rajesh Jha is also a licensed insurance agent, and in this capacity may offer insurance or fixed annuity products to clients seeking his advice on those products. The receipt of commissions for selling insurance products gives the supervised person an incentive to recommend investment products based on the compensation received rather than on the client's needs.

ITEM 5 ADDITIONAL COMPENSATION

Rajesh Jha is not compensated for investment advice in any way from anyone who is not a client of Halo Capital Management LLC. Rajesh Jha does not receive any economic benefits from other companies for managing clients' portfolios.

ITEM 6 SUPERVISION

Rajesh Jha is the President/CEO and the Chief Compliance Officer of Halo Capital Management LLC and is self-supervised and manages Halo Capital Management LLC according to all applicable laws and highest ethical standards. Adviser maintains written supervisory procedures to ensure that the Adviser is in compliance with all applicable State Securities Acts and the Rules and Regulations promulgated thereunder.

ITEM 7 REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Rajesh Jha has never been involved or found liable in any arbitration claim, proceeding, or Bankruptcy petition.