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## Firm Disclosure Brochure

Oxford Chase Advisors LLC

### DISCLAIMER:

**This brochure provides information about the qualifications and business practices of Oxford Chase Advisors LLC. If you have any questions about the contents of this brochure, please contact us at (678)313-6265. 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 Oxford Chase Advisors LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). Our firm's CRD number is 169050.**

### NOTE:

**While Oxford Chase Advisors, LLC may refer to itself as a "registered investment advisor" or "RIA" Clients should be aware that registration itself does not imply any level or skill or training.**

## Item 2 Material Changes

There are no material changes to this brochure.

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#### **Item 4 Advisory Business**

- A. Oxford Chase Advisors LLC (the “Registrant”) is a limited liability company formed on August 14, 2013 in the state of Georgia. The Registrant is owned by Viswanathan Ramakrishnan, Manoj Madhavan & Manish Kapoor.
- B. As discussed below, the Registrant offers to its clients (firms and individuals.) investment advisory services, and, to the extent specifically requested by a client, financial planning and related consulting services.

#### **INVESTMENT ADVISORY SERVICES**

The client can determine to engage the Registrant to provide discretionary investment advisory services on a fee-only basis. The Registrant’s investment advisory fee is based upon a percentage (%) of the market value of the assets placed under the Registrant’s management. For certain accredited investors, we charge fees based on the performance of the portfolio.

In the event that the client requires extraordinary planning and/or consultation services (to be determined in the sole discretion of the Registrant), the Registrant may determine to charge for such additional services, the dollar amount of which shall be set forth in a separate written notice to the client.

Prior to providing investment advisory services, each client will execute an Investment Management Agreement (IMA), giving discretionary trading authority of the client’s assets placed under Registrant’s supervision in a Separately Managed Account (SMA) at Interactive Brokers LLC (Custodian). Thereafter, the Registrant shall allocate investment assets consistent with the designated investment objective(s). The Registrant primarily allocates client investment assets among various publicly traded equities and/or exchange traded funds (“ETFs”).

#### **FINANCIAL PLANNING AND CONSULTING SERVICES (STAND-ALONE)**

To the extent requested by a client, the Registrant may determine to provide financial planning and/or consulting services (including investment and non-investment related matters, including estate planning, insurance planning, etc.) on a stand-alone separate fee basis. Prior to engaging the Registrant to provide planning or consulting services, clients are generally required to enter into a Financial Planning and Consulting Agreement with Registrant setting forth the terms and conditions of the engagement (including termination),

describing the scope of the services to be provided, and the portion of the fee that is due from the client prior to Registrant commencing services. If requested by the client, Registrant may recommend the services of other professionals for implementation purposes. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from the Registrant. Please Note: If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional.

**Please Also Note:** It remains the client's responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

#### **MISCELLANEOUS**

Registrant does not sell or promote any insurance or annuity products. Registrant does not get any soft dollars or commissions from any third parties. Registrant does not get any commission from its broker/custodian.

**Client Obligations.** In performing its services, Registrant shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify the Registrant if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Registrant's previous recommendations and/or services.

**Disclosure Statement.** A copy of the Registrant's written Brochure as set forth on Part 2A of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the Investment Advisory Agreement or Financial Planning and Consulting Agreement. This disclosure will be provided as a link to the Registrant's website containing the Form ADV, rather than as a physical copy.

The Registrant does not participate in a wrap fee program.

## Item 5 Fees and Compensation

- A. The client can determine to engage the Registrant to provide discretionary investment advisory services on a negotiable fee-only basis.

### **INVESTMENT ADVISORY SERVICES**

#### Flat fee option:

If a client determines to engage the Registrant to provide discretionary investment advisory services on a fee-only basis, the Registrant's investment advisory fee shall be based upon a percentage (%) of the market value and type of assets placed under the Registrant's management (between 1.00% and negotiable) as follows:

<b>Market Value of Portfolio</b>	<b>% of Assets</b>
Up to \$10,000,000	1.00%
\$10,000,001 and above	Negotiable

#### Performance fee option:

If a client determines to engage the Registrant to provide discretionary investment advisory services on a performance-fee basis, the Registrant's investment advisory fee shall be based upon a percentage (%) of the quarterly gains placed under the Registrant's management as follows:

20% of Gain in quarterly Market Value of Portfolio subject to a High Water Mark

- B. The Registrant's advisory fees for its Flat-Fee clients will be deducted directly from the client's custodial account. Both Registrant's Investment Management Agreement and the custodial/ clearing agreement may authorize the custodian to debit the account for the Registrant's investment advisory fee and to directly remit that management fee to the Registrant in compliance with regulatory procedures. In the limited event that the Registrant bills the client directly, payment is due upon receipt of the Registrant's invoice. The Registrant shall deduct fees and/or bill clients daily in advance, based upon

the market value of the assets on the previous day. Registrant's annual investment advisory fee for its Flat-Fee clients shall be prorated and paid daily, in advance, based upon the market value of the assets on the previous day. The Registrant, at its sole discretion, may charge a lesser investment advisory fee and/or reduce or waive its annual minimum fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.).

For the Registrant's performance-fee clients, the fee is calculated based on the market value of the assets at the end of each calendar quarter and is deducted directly by the custodian based on the High Water Mark (HWM). If the HWM is not exceeded, no fee is charged for that quarter.

C. The Investment Advisory Agreement between the Registrant and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the Investment Advisory Agreement. Upon termination, no refund of previously billed fees shall be given.

D. Neither the Registrant, nor its representatives accept compensation from the sale of securities or other investment products.

## **Item 6 Performance-Based Fees**

Performance-based fees can be negotiated on a case by case basis for clients with assets over \$10 Million.

## **Item 7 Types of Clients**

The Registrant's clients shall generally include individuals, business entities, trusts, estates and charitable organizations.

## **Item 8 Methods of Analysis, Investment Strategies and Risk of Loss**

A. The Registrant may utilize the following methods of security analysis:

- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

The Registrant may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

**Please Note:** Investment Risk. Investing in securities involves risk of loss that clients should be prepared to bear. Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Registrant) will be profitable or equal any specific performance level(s).

B. The Registrant's methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks. To perform an accurate market analysis the Registrant must have access to current/new market information. The Registrant has no control over the dissemination rate of market information; therefore, unbeknownst to the Registrant, certain analyses may be compiled with outdated market information, severely limiting the value of the Registrant's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

The Registrant's primary investment strategies - Long Term Purchases and Short-Term Purchases - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer-term investment strategy.

C. Currently, the Registrant primarily allocates client investment assets among various public traded stocks and, to a much lesser extent, ETFs, on a discretionary basis.

## **Item 9 Disciplinary Information**

The Registrant has not been the subject of any disciplinary actions.

## **Item 10 Other Financial Industry Activities and Affiliations**

- A. Neither the Registrant, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither the Registrant, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. The Registrant does not have any relationship or arrangement that is material to its advisory business or to its clients with any related person.

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

- A. In accordance with Section 204A of the Investment Advisers Act of 1940, the Registrant also enforces policies reasonably designed to prevent the misuse of material non-public information by the Registrant or any person associated with the Registrant.
- B. Neither the Registrant nor any related person of Registrant recommends, buys, or sells for client accounts, securities in which the Registrant or any related person of Registrant has a material financial interest.
- C. The Registrant and/or representatives of the Registrant may buy or sell securities that are also recommended to clients. However, such purchases or sales by the Registrant, or any related person of the Registrant, are in very small quantities relative to the average daily volume of trades in such securities. Neither the Registrant nor any related person of the Registrant, will buy or sell securities in such volumes as to materially affect the price of

the security.

- D. The Registrant has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of the Registrant's "Access Persons". The Registrant's securities transaction policy requires that an Access Person of the Registrant does not place buy or sell orders in the personal accounts for those securities when the client's buy or sell order is in progress.
- E. The Registrant and/or representatives of the Registrant may buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where the Registrant and/or representatives of the Registrant are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11.D, the Registrant has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Registrant's Access Persons.

## Item 12 Brokerage Practices

Interactive Brokers LLC (Custodian) provides custodial and brokerage services for Registrant. All clients are required to open brokerage accounts with Custodian for execution and/or custodial services.

## Item 13 Review of Accounts

- A. All clients are advised that it remains their responsibility to advise the Registrant of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to review financial planning issues (to the extent applicable), investment objectives and account performance with the Registrant on an annual basis.

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- B. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The Registrant may also provide a written periodic report summarizing account activity and performance.

## **Item 14 Client Referrals and Other Compensation**

If a client is introduced to the Registrant by either an unaffiliated or an affiliated solicitor, Registrant may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from the Registrant's investment advisory fee, and shall not result in any additional charge to the client. If the client is introduced to the Registrant by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of the Registrant's written Brochure with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between the Registrant and the solicitor, including the compensation to be received by the solicitor from the Registrant.

## **Item 15 Custody**

The Registrant shall have the ability to have its advisory fee for each client directly debited by the custodian. Clients are provided, at least quarterly, with written transaction confirmation notices and regular written summary account statements directly from the broker-dealer/custodian and/or program sponsor for the client accounts. The Registrant may also provide a written periodic report summarizing account activity and performance.

## **Item 16 Investment Discretion**

The client can determine to engage the Registrant to provide investment advisory services on a discretionary basis. Prior to the Registrant assuming discretionary authority over a client's account, the client shall be required to execute an Investment Advisory Agreement, naming the Registrant as the client's attorney and agent in fact, granting the Registrant full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name found in the discretionary account.

## Item 17 Voting Client Securities

A. The Registrant does not vote client proxies. Clients maintain exclusive responsibility for:

(1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact the Registrant to discuss any questions they may have with a solicitation.

## Item 18 Financial Information

A. The Registrant is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.

B. The Registrant has not been the subject of a bankruptcy petition.

## Item 19 Requirements for State-Registered Advisors

Oxford Chase Advisors LLC has only three principal executive officers (or management persons): Manish Kapoor, Manoj Madhavan and Viswanathan Ramakrishnan. Their biographical information is given on the attached *BROCHURE SUPPLEMENT* document.