

Firm Disclosure Brochure

Oxford Chase Advisors LLC

4600 Avocet Drive, Peachtree Corners, GA 30092

Website: <https://oxfordchaseadvisors.com>

March 15, 2021

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 Chief Compliance Officer is Manoj Madhavan. He may be reached at manoj@oxfordchaseadvisors.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 Oxford Chase Advisors LLC also is available on the SEC's website at 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.

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 qualified investors, we charge fees based on the performance of the portfolio.

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").

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 Management Agreement. This disclosure will be provided as a link to the Registrant's website containing the Form ADV, rather than as a physical copy.

4 C Registrant offers advisory services tailored to the individual needs of clients. Clients may impose restrictions on trading of select securities and type of securities.

4D The Registrant does not participate in a wrap fee program.

4E Registrant manages assets only on a discretionary basis. As of Dec. 31, 2020

assets managed on a discretionary basis was \$31,800,000.

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:

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

Performance fee option:

Only qualified investors can be offered the performance fee option. A qualified investor is defined (per SEC) as follows:

Any registered investment adviser who wishes to charge a fee based on a share of the capital gains or the capital appreciation of the funds or any portion of the funds of a client must comply with SEC Rule 205-3 (17 Code of Federal Regulations §275.205-3), which permits the use of such fee if the client is a "qualified client" as defined therein:

““Qualified Client” pursuant to SEC Section 205-3 means:

- (i) A natural person who or a company that immediately after entering into the contract has at least \$1,000,000 under the management of the investment adviser;*
- (ii) A natural person who or a company that the investment adviser entering into the contract (and any person acting on his behalf) reasonably believes, immediately prior to entering into the contract, either:*
 - a. Has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$2,100,000(excluding the value of the client's primary residence) at the time the contract is entered into; or*
 - b. Is a qualified purchaser as defined in section 2(a)(51)(AA) of the Investment Company Act of 1940 (15U.S.C. 80a-2(51)(A)) at the time the contract is entered into; or*

(iii) *A natural person who immediately prior to entering into the contract is:*

a. *An executive officer, director, trustee, general partner or person serving in similar capacity, of the investment adviser; or*

b. *An employee of the investment adviser (other than an employee performing solely clerical, secretarial or administrative functions with regard to the investment adviser) who, in connection with his or her regular functions or duties, participates in the investment activities of such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar functions or duties for or on behalf of another company for at least 12 months.”*

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 net 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. The client will incur transaction and custodian fees payable to the broker/custodian. If the Registrant purchases any mutual funds or ETFs on behalf of the client, the ETF sponsor/mutual fund owner adjusts the NAV to account for the fees.

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. Performance-based fees will only be charged in accordance with the provisions of CCR Section 260.234 as per the provisions of the Board Rules 116.13 given below:

Any registered investment adviser who wishes to charge a fee based on a share of the capital gains or the capital appreciation of the funds or any portion of the funds of a client must comply with SEC Rule 205-3 (17 Code of Federal Regulations §275.205-3), which permits the use of such fee if the client is a "qualified client" as defined therein:

“*Qualified Client*” pursuant to SEC Section 205-3 means:

- (i) *A natural person who or a company that immediately after entering into the contract has at least \$1,000,000 under the management of the investment adviser;*
- (ii) *A natural person who or a company that the investment adviser entering into the contract (and any person acting on his behalf) reasonably believes, immediately prior to entering into the contract, either:*
 - a. *Has a net worth (together, in the case of a natural person, with assets held jointly with a spouse) of more than \$2,100,000(excluding the value of the client’s primary residence) at the time the contract is entered into; or*
 - b. *Is a qualified purchaser as defined in section 2(a)(51)(AA) of the Investment Company Act of 1940 (15U.S.C. 80a-2(51)(A)) at the time the contract is entered into; or*
- (iii) *A natural person who immediately prior to entering into the contract is:*
 - a. *An executive officer, director, trustee, general partner or person serving in similar capacity, of the investment adviser; or*
 - b. *An employee of the investment adviser (other than an employee performing solely clerical, secretarial or administrative functions with regard to the investment adviser) who, in connection with his or her regular functions or duties, participates in the investment activities of*

such investment adviser, provided that such employee has been performing such functions and duties for or on behalf of the investment adviser, or substantially similar functions or duties for or on behalf of another company for at least 12 months.”

Item 7 Types of Clients

The Registrant’s clients shall generally include individuals, business entities, trusts, estates and charitable organizations. For opening or maintaining an account with the Registrant, there is a minimum account size requirement of \$50,000. This requirement may be waived at the discretion of the Registrant.

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

Neither the Registrant nor any management person of the Registrant have been involved in any criminal or civil action in a domestic, foreign or military court of competent jurisdiction.

Neither the Registrant nor any management person of the Registrant have been subject to any administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority

Neither the Registrant nor any management person of the Registrant have been involved in any self-regulatory organization (SRO) proceeding.

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.
- D. The Registrant does not recommend or select other investment advisers for the clients. The registrant does not receive compensation directly or indirectly from any advisers. The Registrant does not have any business relationships with any advisers.
- E. Manoj Madhavan is the owner and CEO of Hybrid Solutions Inc. Hybrid Solutions Inc has not had any clients or revenues from customers since 2015.

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.

A copy of the code of ethics will be provided to any client or prospective client upon request.

Item 12 Brokerage Practices

- A. 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.
 - 1. The Registrant uses Interactive Brokers as its sole custodian and broker-dealer. The Registrant does not offer any other broker-dealer for client transactions. The Registrant is not compensated directly or indirectly for any client transactions. Interactive Brokers has a Smart Routing option. The Smart Routing software continually scans competing markets and automatically routes orders directly to the best ECN or market center -- based on price but also taking into account factors such as the availability of automatic order execution.
The Registrant does not receive any Research and Other Soft Dollar Benefits from the sole custodian/broker dealer who is "Interactive Brokers.

2. The Registrant uses "Interactive Brokers" as the sole custodian and Broker-Dealer. The Registrant does not receive any client referrals from "Interactive Brokers".
 3. The Registrant does not allow clients to direct brokerage. The Registrant does not recommend, request or require that a client direct the Registrant to execute transactions through a specified broker-dealer.
 4. The factors we consider in selecting broker-dealers for client transactions are as follows
 - Ability to consolidate and simultaneously place trades across multiple Separately Managed Accounts (SMAs).
 - Execution capabilities and opportunity for price improvement.
 - The promptness of execution.
 - Handling large trades.
 - Ability to maintain confidentiality of trading intentions.
 - Availability of technology to process trades.
 - Reliable and accurate settlement capabilities.
 - Competitiveness in the marketplace.
 - Financial responsibility and responsiveness to the adviser; and
 - Additional services provided to clients such as timely reporting and custodial services
- B. The Registrant uses the feature/functionality provided by "Interactive Brokers" to aggregate the purchase or sale of securities for various client accounts.

Item 13 Review of Accounts

- A. All the three principals of the Registrant conduct periodic review of the client accounts. The review is triggered by i) Opportunity to add a new security ii) Changes in the macroeconomic factors and iii) Changes in the Federal reserve policy iv) Changes in the prospects of the existing holdings. 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 investment objectives and account performance with the Registrant on an annual basis.
- 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.

- C. The Registrant prepares a newsletter every quarter and emails it to the clients. The newsletter highlights the Registrants view of the economic conditions and any major purchase or sale of securities in the portfolio. It also sometimes highlights the merits of a specific security added in the portfolio.

Item 14 Client Referrals and Other Compensation

- A. The Registrant is compensated solely by the client for investment advisory services. The Registrant is not compensated through cash/gifts/soft dollars directly or indirectly by any other parties. This eliminates any conflicts of interest. The Registrant is always incentivized to act in the best interest of the client.
- B. The Registrant does not compensate any third party for client referrals.

Item 15 Custody

A. The Registrant has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee.

B. The Registrant has written authorization from the client to deduct advisory fees from the account held with the qualified custodian.

C. The Registrant's sole broker/custodian withdraws the prorated Advisor fee each trading day, directly from client accounts. Since there are 253 trading days in a year, it is not practical to send an invoice to each client at the end of each trading day. However, the registrant will send a consolidated invoice at the end of each quarter, itemizing the fees that were charged for that quarter. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based, and the time period covered by the fee.

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.

The client can place limitations on the Registrant's discretionary authority.

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. The Registrant does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.
- B. The Registrant has not been the subject of a bankruptcy petition.

Item 19 Requirements for State-Registered Advisors

A & B : 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 in the attached *BROCHURE SUPPLEMENT* document.

C: For some qualified clients, the Registrant charges performance-based fees. The fees are computed as a percentage of the quarterly gains. To reduce the risk taken by the Registrant, the Registrant uses a High Water Mark (HWM) for computation of fees.

The Registrant charges performance fees only if the client's portfolio value has crossed the previous HWM

D: None of the Registrant's management persons have been involved in any of the following events:

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:

(a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:

(a) an investment or an investment-related business or activity; (b) fraud, false statement(s), or omissions; (c) theft, embezzlement, or other wrongful taking of property; (d) bribery, forgery, counterfeiting, or extortion; or (e) dishonest, unfair, or unethical practices.

E: None of the Registrant's management persons have any relationship with any issuer of securities

Item 20; Business Continuity Plan

Maintenance of critical operations and protections, and the protection, backup, and recovery of data.

- 1) All three principals (Manoj Madhavan, Manish Kapoor and Viswanathan Ramakrishnan) have authority to trade on behalf of Oxford Chase Advisors (the Firm) for client accounts.
- 2) All three principals have the ability to oversee and manage client accounts.
- 3) All client information is stored on the Microsoft One Drive account of the Firm. This is on the cloud and is accessible from any computer with the correct username and password.
- 4) The contact information for our sole custodian and broker-dealer is
Website: <https://www.interactivebrokers.com>
Phone number: 1-866-694-2757

Pre-arranged alternative physical location(s) for adviser's offices.

The Firm does not store any key information at a physical location. All key information is store in OneDrive on the cloud in the Firm's account that is accessible by all three Principals.

Communication With Clients, Employees, Service Providers, and Regulators.

The Firm does not have any employees besides the three Principals. All three Principals have access to all the client information that is store in the Firms' OneDrive folder in the cloud.

Identification and assessment of third-party services critical to operation of the adviser.

Key third-party service providers

- 1) Sole broker and Custodian : Interactive Brokers LLC Website:
<https://www.interactivebrokers.com>, Phone number: 1-866-694-2757
- 2) Firm website <https://www.oxfordchaseadvisors.com> is hosted by GoDaddy.
Website: <https://www.godaddy.com/>
Phone: 1-480-463-8390
- 3) Banking services are provided by Fidelity Investment Services
Website: <https://www.fidelity.com/customer-service/contact-us>
Phone:1-800-343-3548
- 4) Microsoft Teams and Office subscription is provided by Warren Averett Technology Group
Phone: 888.419.9090
Email: resource.center@warrenaverett.com
Website: <https://warrenaverett.com/warren-averett-technology-group/>