

**Part 2A of Form ADV: Firm Brochure**

**Item 1: Cover Page**

**Londinium Asset Management Ltd.  
11 Avenue Princesse Grace  
Monaco 98000  
377-9770-3581**

**March 15, 2012**

This brochure provides information about the qualifications and business practices of Londinium Asset Management Ltd. If you have any questions about the contents of this brochure, please contact us at 377-9770-3581 (phone) or [pkhatau@aol.com](mailto:pkhatau@aol.com) (e-mail). 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 Londinium Asset Management Ltd. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2: Material Changes**

None

### Item 3: Table of Contents

Item 1: Cover Page.....	1
Item 2: Material Changes.....	2
Item 3: Table of Contents .....	3
Item 4: Advisory Business .....	4
Item 5: Fees & Compensation.....	5
Item 6: Performance-Based Fees and Side-By-Side Management .....	6
Item 7: Types of Clients.....	7
Item 8: Method of Analysis, Investment Strategies and Risk of Loss .....	8
Item 9: Disciplinary Information .....	9
Item 10: Other Financial Industry Activities and Affiliations .....	10
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	11
Item 12: Brokerage Practices .....	12
Item 13: Review of Accounts .....	13
Item 14: Client Referrals and Other Compensation.....	14
Item 15: Custody .....	15
Item 16: Investment Discretion.....	16
Item 17: Voting Client Securities .....	17
Item 18: Financial Information .....	18
Item 19: Requirements for State Registered Advisers .....	19
Part 2B of Form ADV: Brochure Supplement.....	20

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

Londinium Asset Management Ltd. (“Londinium”) was founded by Pravin Khatau, the Chief Executive Officer and sole owner in August 2006.

We offer investment advisory services to corporations and other business entities on investments in equity and convertible bond securities that are exchange-listed securities, securities traded over the counter and foreign issuers including securities listed in global markets; warrants; corporate debt securities (other than commercial paper); and option contracts on securities. We also advise on non listed and alternative investments globally.

As of December 31, 2011, we managed \$52 million in proprietary assets on a discretionary basis.

### **Item 5: Fees & Compensation**

Our fees are based on 2% of assets under management. The fee is payable quarterly in arrears and is billed to the client.

The client will be responsible for all incurred fees and expenses such as custodian and brokerage fees.

## **Item 6: Performance-Based Fees and Side-By-Side Management**

We charge a 20% performance fee with a high water mark.

### **Item 7: Types of Clients**

We currently perform investment advisory services to Londinium's proprietary account only and may offer investment advice to corporations and other business entities. We do not impose a minimum dollar value of assets or any other condition for establishing or maintaining an account.

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

We use a fundamental top approach to our securities analysis, as well as charting and technical methods relying on a variety of information sources (e.g., financial newspapers and magazines, corporate rating services, company press releases) including live data feeds such as briefing.com. When implementing our investment advice given to clients, we apply investment strategies such as long and short term purchases, trading, short sales, margin transactions, and options writing, including covered options, uncovered options, or spreading strategies. We also tailor each portfolio according to the specific needs of the client. Please note that investing in securities does include the risk of loss that you should be prepared to bear.



### **Item 9: Disciplinary Information**

There have been no disciplinary actions against Londinium, its sole officer and owner, Mr. Khatau or any of its employees within the last ten years by any domestic, foreign or military court; the SEC, any other federal regulatory agency; any state regulatory agency or any foreign financial regulatory authority; or any self-regulatory organization (SRO).

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

We have no other financial industry activities or affiliations at this time.

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

We have adopted the following Code of Ethics and Professional Standards (the “Code”) to help avoid prohibited acts and to eliminate potential conflicts of interest. The Code is designed to govern personal securities trading and detect/prevent insider trading. The Code, among other things, sets forth our policy that clients’ interests are always placed ahead of any personal interest. This policy requires buying and selling after or with transactions completed for clients and includes procedures requiring all our employees to report their personal securities transactions to the Chief Compliance Officer on a periodic basis. The Code also forbids any member or employee from trading, either personally or on behalf of others, on material non-public information or communicating material non-public information to others in violation of the law (i.e., insider trading). We believe that the Code, designed to detect and prevent insider trading and to govern personal securities trading, is appropriate to prevent or eliminate potential conflicts of interest situations between us, our employees and our clients. However, clients should be aware that no set of rules can possibly anticipate or relieve all potential conflicts.

As a professional organization serving the public in the area of asset management, we are guided in our actions by the highest ethical and professional standards. Our Code will be provided to clients upon written request.

## **Item 12: Brokerage Practices**

We have relationships with a number of broker-dealers. We rely on them for investment advice and research, good execution and sometimes allocations on primary and secondary equity and convertible bond issues.

We pay the broker-dealers a fair commission which is negotiated based on the level of our business as well as the level of service required. We have no soft dollar arrangements and do not have any markups or any such arrangements or any conflicts of interest.

### **Item 13: Review of Accounts**

The sole Portfolio Manager and sole reviewer, Pravin Khatau, will continually review the transactions effected, and current assets and expenses as compared to the investment objectives.

Clients will receive unaudited quarterly reports and an annual report. In addition, investors within a fund being managed by us will receive a report within 45 days of the end of the calendar year for their individual income tax reporting obligations with respect to their investment in the fund.

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

We do not refer clients nor do we receive any other compensation in connection with referrals.

### **Item 15: Custody**

The custody of funds will be placed with either banks or brokerages where the client has an existing relationship or to a major bank or broker-dealer introduced by us. The client will receive a quarterly statement from the custodian directly. The client should carefully review these statements.

### **Item 16: Investment Discretion**

We currently only have investment discretion for the proprietary account of the sole owner, Londinium.



## **Item 17: Voting Client Securities**

We do not vote proxies.

### **Item 18: Financial Information**

There are no financial issues that are likely to impair our ability to meet our contractual commitments.

**Item 19: Requirements for State Registered Advisers**

Not Applicable.

**Part 2B of Form ADV: Brochure Supplement**

## **Brochure Supplement – Pravin Khatau**

### **Item 1. Cover Page**

**Pravin Khatau  
Londinium Asset Management Ltd.  
11 Avenue Princesse Grace  
Monaco 98000**

**March 15, 2012**

This supplement provides information about Pravin Khatau that supplements the Londinium Asset Management Ltd. brochure. You should have received a copy of that brochure. Please contact me if you did not receive our brochure or if you have any questions about the contents of this supplement.

## **Item 2. Educational Background and Business Experience**

Name: Pravin Khatau

Year of Birth: 1960

Formal Education after High School:

UCLA, B.A., Wharton School, M.B.A.

Business Background for Preceding Five Years:

Self-employed, Director of Londinium Asset Management Ltd. (formerly LRM Holdings, Inc.), 1996-present

Executive Director, Goldman Sachs & Co., London, UK, 1985-1994

## **Item 3. Disciplinary Information**

None.

## **Item 4. Other Business Activities**

None.

## **Item 5. Additional Compensation**

None

## **Item 6. Supervision**

Not Applicable.