

Item 1. Cover Page
Form ADV, Part 2A Brochure

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This brochure provides information about the qualifications and business practices of Concentric Capital LLC. If you have any questions about the contents of this brochure, please contact our firm by telephone at (310) 734-0230 or by email dpost@concentricllc.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 Concentric Capital LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Please note that the use of the term "registered investment adviser" and description of Concentric Capital LLC and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2. Material Changes

On July 28, 2010, the United States Securities and Exchange Commission (“SEC”) changed the requirements of the disclosure document. This disclosure document, amended March 2, 2012, is prepared according to those new requirements and is materially different in structure. We will update this brochure annually, or more frequently in the event of certain material changes. In the future, this section will outline and summarize the specific material changes made since the previous update.

Since our last filing on 03/06/2012, Concentric has also begun the process of switching from SEC to State registration. We have also amended Item 4 “Advisory Business” to correct the percentage of ownership of our firm.

For any questions regarding this change, please contact our Chief Compliance Officer, David Post.

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Item 4. Advisory Business

The Firm

Concentric Capital LLC, (“Concentric”) was founded in March, 2009. David Post and Rosebud LLC own 51% and 49% of Concentric, respectively. Rosebud LLC is 100% owned by Craig Menin, Member. David Post is the managing member and is solely responsible for Concentric’s investment decisions. Craig Menin does not participate in the day-to-day operation of the firm.

Discretionary Investment Management Services

Concentric actively manages clients’ portfolios on a discretionary basis. In making its investment decisions, Concentric considers the merits of the investment, whether an investment will assist the client in pursuing the client’s investment objective and whether it will violate any investment restrictions imposed by a client.

If you engage Concentric we will review your investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing your account. Your participation and full and accurate disclosure of requested information is essential for us to assist you in realizing your investment objectives. Concentric relies upon the financial and other information you provide. You will also need to inform us of any changes in your financial condition, goals or of other factors that may affect our advice to you.

You may place restrictions upon the types of securities or specific securities to be purchased, sold or held in your account. You may place reasonable restrictions on the individual investments in your account. These restrictions must be in writing and accompany the investment management agreement.

Non-Discretionary Investment Management Services

Concentric makes recommendations to clients on an as needed basis taking into consideration its own proprietary monthly forecasts of asset class, projected returns, the individual client’s needs, and the assets which are available to the client for investment. Clients may choose to accept or not accept Concentric’s recommendations. Clients are also responsible for implementing recommendations.

Wrap Fee Program

We do not offer wrap fee programs.

Assets under Management

As of Decemebr 31, 2011, Concentric manages \$34 million in client assets on a discretionary basis and manages \$0 on a non-discretionary basis.

Item 5. Fees and Compensation

We are required to describe our brokerage, custody, fees, and fund expenses so you will know how much you are charged and by whom for our advisory services provided to you. We disclose that lower fees for comparable services may be available from other sources. Concentric has negotiated different fees for clients and may continue to do so.

Advisory Services Fees

Fees for investment management services are calculated as a percentage of the gross market value of all assets under management in your account, including cash, any securities purchased on margin and any margin balance calculated as of the close of business on the last business day of the prior calendar quarter for which the fees are being billed, according to the following annual fee schedule:

<u>Market Value of the Account</u>	<u>Fee</u>
\$1 million or less	1.30%
\$1 million to \$5 million	1.15%
\$5 million - \$10 million	0.75%
Above \$10 million	0.50%

The gross market value of the securities held in your account is independently determined by the custodian. Advisory fees in the first quarter of service will be prorated from the inception date to the end of the first quarter. The fee rate shall not be increased due to a decline in the gross market value of the account.

Investment management fees are billed quarterly, in arrears, meaning that we invoice you after the end of each quarter. Payment in full is expected upon invoice presentation. Alternatively, you may choose to be separately billed or to have our fee automatically deducted directly from your portfolio by the custodian.

Concentric has negotiated different fees for clients and may continue to do so. In some instances, these fees may be based on a fixed amount per year as opposed to a percentage of assets under management. Concentric, in its sole discretion, may waive its minimum fee and/or charge a lesser fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, etc.). Concentric may in the future provide its investment management services to family members free of charge or on a reduced fee basis.

Other Fees and Expenses

In connection with investments made on behalf of your account, you will also incur all fees and charges imposed by third-parties, including all custodial and securities execution fees charged by the custodian and executing broker-dealer and all fees and expenses charged by mutual funds in which your assets may be invested. The investment advisory fees charged by Concentric are separate and in addition to these custodial, execution, mutual fund and ETF fees.

Your account will typically be held at a brokerage firm of your choosing. Cash in your account may be swept into a money market fund; it is also possible that you may invest in one or more hedge funds, mutual funds or ETFs, in which case, you will, in effect, be paying two investment advisory fees: one to Concentric and one to the fund manager. Mutual Fund expense ratios are listed in each fund's annual report. You may also pay brokerage commissions in connection with the purchase or sale of fund shares. Please also see the "Brokerage Practices" section of this Brochure.

You should review all fees charged by mutual funds, ETFs, Concentric and others to fully understand the total amount of fees you will pay.

Contributions and Withdrawals from Accounts

You may add money to your account at any time. You may withdraw money from your account at any time upon your written request. Some funds impose fees if they are sold prior to their short term holding periods. Short-term trading fees are detailed in each fund's prospectus. The value of your assets upon withdrawal may be more or less than the original cost to you, depending upon the market value of the assets at the time of the withdrawal. Our fees will be prorated for significant contributions and withdrawals made during the quarter.

Termination

You may terminate your agreement with Concentric at any time upon thirty days' written notice to Concentric. Concentric may terminate its agreement with you upon thirty days' prior written notice. Concentric may also terminate an agreement with you if you place orders for transactions in the same account that Concentric is managing for you. Fees will be prorated through the date of termination.

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

Concentric does not charge performance-based fees.

Item 7. Types of Clients

Description

Concentric provides investment advice to high net worth individuals. On rare occasion, Concentric may offer advisory services to the following type of Clients: individuals, IRAs, pension and profit sharing plans, trusts, estates, charitable organizations and small businesses.

Account Minimums

The minimum account size is \$1,000,000. Accounts of less than \$1 million may be set up when the client and the advisor anticipate the client will add additional funds to the

accounts bringing the total to \$1 million within a reasonable time.

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

Methods of Analysis

Concentric's security analysis is generally based on the financial fundamentals of the issuer of the security. This means that we analyze individual investment opportunities, by reviewing the company's financial statements to determine its overall financial picture and determine financial ratios to compare the company's relative value to its competitors. In certain cases, Concentric uses technical and cyclical analysis to assist in determining that a security's price movement and availability are at attractive entry points in the timing of investment purchases and sales.

Concentric's main sources of information include financial newspapers and magazines, inspections of corporate activities, research materials prepared by others, corporate rating services, timing services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases. Other sources of information that Concentric may use include Morningstar mutual fund information, Morningstar stock information, Charles Schwab & Company's "SchwabLink" service, and any other information generally found using the Internet.

Investment Strategies

The investment strategy for a specific client is based upon the goals and objectives developed through consultations with the client. Ongoing discussions with our client's may result in a change of objectives and asset allocation. In addition, market changes impacting established asset allocations will prompt rebalancing to the originally agreed to asset allocation.

Strategic asset allocation is the primary driver of a client's investment strategy. Once asset allocation is set, investments are selected and then implemented in the client's portfolio. Portfolios are well diversified and invested in a range of investments including, Individual Securities, Mutual Funds, Exchange Traded Funds, American Depositary Receipts, Emerging Markets, International Funds and Master Limited Partnerships. In certain accounts, hedge funds and hedge fund of funds are included in the investment strategy.

Risk of Loss

Investing in securities involves significant risk, including the risk that you could lose your entire investment; you should be prepared to bear this loss. Securities will fluctuate in value and may lose value. The issuer of a security may declare bankruptcy and its securities may become worthless, but simply you could lose your entire investment. Concentric cannot predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. You should also carefully consider to what extent assets can be invested on a long-term basis. Concentric will assist you in determining an appropriate strategy to achieve

your investment objectives based on your tolerance for risk and other factors noted above. There is no guarantee that you will meet their investment objectives.

Our investment strategies use diversification to mitigate risk and we constantly keep the risk of loss in mind. However, the following investment risks cannot be eliminated:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

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 Concentric or the integrity of Concentric's management. Concentric has no legal or disciplinary events to report.

Item 10. Other Financial Industry Activities and Affiliations

The sole business of Concentric is to provide investment advisory services to its clients. Concentric does not engage in any other business nor does it maintain any affiliations with other firms.

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

Code of Ethics

In addition to stating general ethical principles, the Code of Ethics, is designed to prevent the unlawful use of material non-public information by Concentric, or any of its members, managers, directors, officers or investment personnel ("Access Persons"). The Code also specifies policies and procedures for the reporting of personal securities trading (including the trading of initial public offerings and private placements), the reporting ethical violations, and for review and enforcement of the Code. Copies are available upon request by contacting Alex Camera at (310) 734-0230 or via email at acamara@concentricllc.com.

Personal Trading

In order to ensure that Concentric places the interests of its clients first, the Code requires all Access Persons to obtain Concentric's approval before purchasing or selling any investment (excepting exempted securities, such as ETFs, mutual funds, governmental obligations, and money market type instruments) and requires Access Persons to periodically report to David Post, Concentric's Chief Compliance Officer of their personal holdings and transactions of non-exempted securities. The Chief Compliance Officer reviews all employee trades each month. His trades are reviewed by Aaron Hattenbach. The personal trading reviews ensure that the personal trading of employees does not affect the markets and that clients of the firm receive preferential treatment. Since all employee trades are small relative the daily trading volume of any security purchased or sold, the trades do not affect the securities markets.

Participation in Client Transactions

Concentric may hold, purchase or sell on behalf of its clients the same securities as Concentric or its Access Persons purchase, sells or holds. Orders for clients' transactions will precede orders in the same securities on the same day as orders for Concentric or its Access Persons.

Concentric or its Access Persons may purchase or sell the same securities as clients at the same time as clients in a block trade with clients. Each participant in such a block trade will receive the same average price per share and will share the transaction costs pro rata except for differences due to minimum ticket charges.

Concentric and its Access Persons may take positions in securities contrary to those taken for clients. Moreover, Concentric is under no obligation to purchase, hold or sell for clients the same securities as Concentric purchases, holds or sells for itself or its president.

Investing in securities our clients also invest in presents a potential conflict of interest because we obviously want the value of those securities to rise to benefit our own accounts sometimes known as “front-running” or “scalping”. The practice of “front-running” or “scalping” is when an investment adviser or employee of an investment adviser purchases a security for their own account(s) prior to purchasing in their clients’ accounts and then profitably selling the stock. We believe this potential conflict of interest is reduced or eliminated because the securities we invest in and recommend to our clients are widely held and publicly traded. Therefore the orders that Concentric typically places for its clients are simply too small to move the prices of securities more than a few cents, at most. Even then, the price movement would only be temporary. Thus, the possibility of a security price rising solely as a result of our clients’ purchasing the security is basically zero. Also, if we execute trades for our client accounts and our own accounts in the same trading session we will execute trades for our own accounts after client trades are completed.

Item 12. Brokerage Practices

Concentric currently recommends, but does not require, that clients establish accounts with Charles Schwab & Co., Inc. (Schwab), a FINRA registered broker-dealer to maintain custody of clients’ assets and to effect trades for their accounts.

Research and Other Soft Dollar Benefits

Concentric receives, free of charge, certain data, reporting and support services from Charles Schwab. Charles Schwab also makes available to Concentric other products and services that benefit Concentric but may not benefit its clients’ accounts. Some of these other products and services assist Concentric in managing and administering clients’ accounts. These include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of Concentric’s fees from its clients’ accounts, and assist with back-office support, record keeping and client reporting. Many of these services generally may be used to service all or a substantial number of Concentric’s accounts, including accounts not maintained at Charles Schwab. Charles Schwab may also provide Concentric with other services intended to help Concentric manage and further develop its business enterprise. These services may include consulting, publications and presentations on

practice management, information technology, business succession, regulatory compliance, and marketing.

In addition, Charles Schwab may make available, arrange and/or pay for these types of services to Concentric by independent third parties. Charles Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Concentric. So long as a total of at least \$10 million of an advisor's clients' assets are maintained in accounts at Schwab, Schwab provides Concentric with access to Schwab's institutional trading and custody services. If its clients' accounts were not custodied at Charles Schwab, Concentric would have to pay for these services. Thus, Concentric has an economic incentive to recommend to its clients that they have their account custodied at brokerage or custodial firms that provide these services free of charge to Concentric.

Directed Brokerage

Concentric typically suggests that clients have their account custodied at Charles Schwab. If the client's account is custodied at a brokerage firm or a custodian affiliated with a brokerage firm, Concentric will place orders for the client's account through such brokerage firm. Concentric has discretionary authority regarding the commission rates at which securities transactions for clients are effected to the extent that it has discretion to choose the brokers or dealers through which securities are bought or sold.

Concentric may also use full service brokers if it feels that the quality of the services rendered by them justifies the commissions charged by them. However, if clients' trades were placed with discount brokers, the commissions paid by the clients would be lower. If orders for transactions for clients' accounts are placed with a broker other than the custodial broker or its affiliate, the custodial broker may impose an additional charge for arranging such transactions. It is possible that clients would pay less in total brokerage costs if they used a broker and custodian different from the broker and custodian recommended by Concentric.

Aggregation and Allocation of Trades

Transactions in the same securities for several clients and for Concentric or its Access Persons may be combined into one block. In such a situation, each participant in the block trade will receive the average price, and, if the order cannot be completely filled, each participant in the block trade may receive, to the extent feasible, his pro rata share of the block trade. However, if an aggregated order cannot be filled entirely, Concentric may allocate the trade only to larger accounts, to accounts, which can be filled entirely, or only to the account(s) of the client who gave Concentric the investment idea. Also, if the allocation to an account would be less than 1,000 shares, Concentric may not allocate any of the aggregated order to such accounts.

Typically, larger clients who participate in the block trade will each pay brokerage commissions at the same rate except that each such participant in the block trade is subject to the minimum ticket charge of the brokerage firm that is effecting the transaction. Smaller clients who participate in the block trade may pay commissions

at a much higher rate than larger clients. If the size of the client's order is so small that the commission on his portion of the block transaction does not satisfy the brokerage firm's minimum ticket charge for each transaction, then such a client will instead pay a brokerage commission equal to the minimum ticket charge of the brokerage firm. Such clients will, in effect, be paying brokerage commissions at a higher rate per share than other clients whose transactions are large enough to satisfy the minimum ticket charge.

Item 13. Review of Accounts

Reviews

Client accounts are reviewed at least weekly by David Post (Chief Compliance Officer) to determine if it is appropriate to adjust each client's portfolio mix based on changes in market conditions or other agreed upon risk parameters.

Reports

On a quarterly basis, Concentric provides account statements to its clients. These statements aggregate all of the client's accounts and provide commentary as to the status of economy and the investment markets, as well as other information that may be germane to the clients.

Item 14. Client Referrals and Other Compensation

Concentric is not paid for referring clients to a particular investment and Concentric does not pay others for client referrals.

Item 15. Custody

Concentric does not provide custodial services to its clients. Client assets are held with banks or registered broker-dealers that are "qualified custodians." Clients will receive statements directly from the qualified custodians at least quarterly. We urge clients to carefully review those statements and compare the custodial records to the quarterly reports that we provide them. The information in our reports may vary from custodial statements based on accounting procedures, reporting dates or valuation methodologies of certain securities.

State Securities Bureaus, or their equivalent, generally take the position that any arrangement under which a registered investment adviser is authorized or permitted to withdraw client funds or securities maintained with a custodian upon the adviser's instruction to the custodian is deemed to have custody of client funds and securities.

As such, we have adopted the following safeguarding procedures:

- (1) Our clients must provide us with written authorization permitting direct payment to us of our advisory fees from their account(s) maintained by a custodian who is independent of our

firm;

- (2) We must send a statement to our clients showing the amount of our fee, the value of your assets upon which our fee was based, and the specific manner in which our fee was calculated;
- (3) We must disclose to you that it is your responsibility to verify the accuracy of our fee calculation, and that the custodian will not determine whether the fee is properly calculated; and
- (4) Your account custodian must agree to send you a statement, at least quarterly, showing all disbursements from your account, including advisory fees.

Item 16. Investment Discretion

We generally accept client's assets for management on a discretionary basis. Your assets will be managed in accordance with your individualized investment plan, which will include any specific restrictions that you may direct. The client and Concentric will enter into an investment management agreement appointing Concentric as the investment advisor and authorizing Concentric to manage the Client's account, your instructions to your broker will include a limited power of attorney authorizing Concentric to trade your account.

If you retain us to manage your assets on a discretionary basis, the investment advisory agreement that you will execute will authorize us to direct the execution of portfolio transactions without consulting you prior to each transaction, specifically, we will determine (i) the securities to be bought and sold for your account, (ii) the amount of the securities to be bought and sold, (iii) the brokers or dealers to be used for the transaction, and/or (iv) the commission rates to be paid for the transaction, in each case, subject to such restrictions as you may have imposed in the investment advisory agreement.

Item 17. Voting Client Securities

Concentric will not ask for, nor accept voting authority for client securities but upon your request, we may provide advice to clients regarding proxy contests of significant matter. Clients will receive proxies directly from the issuer of the security or from their custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18. Financial Information

We do not require nor do we solicit prepayment of more than \$500 in fees per client, six months or more in advance. Therefore we have not included a balance sheet for our most recent fiscal year. There are no financial conditions that are likely to impair our ability to meet our contractual commitment to clients. Concentric has not been the subject of a bankruptcy petition at any time during the past ten years.

Item 19. Requirements for State-Registered Advisers

Management Persons

David Post serves as the sole management person for Concentric Capital LLC. Mr. Post attended University of California, Berkeley graduating with a Bachelor of Arts Degree in Social Sciences(Business/Political Science).

Mr. Post has been in the Investment and Wealth Management business since starting his career with Merrill Lynch in 1979. Prior to founding Concentric, David served in various capacities in the Investment Advisory business, including the following:

- Managing Director of CSI Capital Management, an independent management firm based in San Francisco, CA. While at CSI, David served as a portfolio manager for high net worth and institutional clients and was a member of the firm's fixed income and equity investment committees. (2003 – 2007).
- Founder, CEO and Portfolio Manager of 3Bridge Capital, an investment management firm with \$1 billion under management serving both high net worth and institutional clients. Founded in 2000, 3Bridge merged with CSI Capital Management in 2003. (2000-2003).
- CEO and Portfolio Manager at Hanson Investment Management, an institutional and high net worth manager with \$1.5 billion under management. David began at Hanson as a portfolio manager and then served as CEO for five years before leaving to found 3Bridge Capital. (1994-1999).

Other Business Activities of Management Persons

Mr. Post currently serves on the board of Vaska LLC, a privately held consumer goods company. This does not take away from any trading time activities nor does it affect the Mr. Post's role as an Investment Adviser Representative of Concentric Capital LLC.

Additional Compensation of Management Persons

We do not charge performance-based fees nor do our management persons receive additional advisory fees from other sources other than the fees mentioned in Item 5 of this Firm Brochure.

Disciplinary Information of Management Persons

Mr. Post has no disciplinary history to disclose.

Financial Relationships of Management Persons

Concentric Capital LLC and its management persons do not have any relationship or arrangement with any issuer of securities that is not listed in Item 10.C. of Part 2A.

Conflict of Interest Disclosure

All material conflicts of interest under CCR Section 260.238(k) are disclosed in this Brochure regarding the investment adviser, its representatives and any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice. Our firm does not receive compensation arrangements connected with advisory services which are in addition to advisory fees. Our firm and our representatives do not have financial affiliations and/or receive compensation outside of our firm's advisory fees. As a fiduciary, we always put our Client's interest above our own. Information regarding participation of interest in client transactions can be found in our Code of Ethics as well as Item 12 of this Brochure.