

Part 2A of Form ADV: Firm Brochure

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Item 1) Cover Page

- A. Ricaldo Zavala
5980 Rancho Diegueno Road
Del Mar, CA 92014
- B. This brochure provides information about qualifications and business practices of Ricaldo Zavala. If you have any questions about the contents of this brochure, please contact us at (858) 228-6820 or ricaldozavala@gmail.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 Ricaldo Zavala is also available on the SEC website at <http://www.adviserinfo.sec.gov>

Item 2: NOT APPLICABLE

Item 3: Table of Contents

SEE ABOVE

Item 4: Advisory Business

Ricaldo Zavala is the sole owner. He has been in the securities business for 32 years and has serviced clients on the European markets specialized in equities and stock portfolio selection.

He has been an adviser to high net worth individuals and is currently managing 270 million dollars on discretionary basis as of June 30th 2012

Item 5: Fees and Compensation:

There are no maintenance management fees charged to the client.

Item 6: Performance Based Fees and Compensation

Ricaldo Zavala is compensated on his performance for his advice. The following table contains his fee schedule on a yearly basis:

10%	Incentive fees up to 5% net return to client
15%	Incentive fees up to 10% net return to the client
20%	Incentive fees up to 15% net return to the client
25%	Incentive fees up to above 15% net return to the client

The fees are negotiable on an individual basis if the client prefers a different method of incentive. The fees are charged by invoice on a quarterly basis, only if the performance reaches the segment involved.

There are no other fees charged to the client. There are no fees due in advance. Both the client and the asset manager can terminate the agreement at any time. The clients are using their own financial institution, and keep their asset deposit there. The asset manager does not receive any asset management fee or brokerage fee or any other form of compensation beside the incentive fee. The client is free to use any financial institution he desires.

Item 7 – Types of Clients

Ricaldo Zavala's clients are high-net worth individuals with \$1 Million Dollars in investable assets. I provide service to individuals, trusts, pension funds, and investment companies.

Item 8 – Methods of Analysis, Investment Strategies

The clients have the option to purchase investment products that Ricaldo Zavala recommends through other brokers or agents that are not affiliated with Ricaldo Zavala.

Ricaldo Zavala advises investment in the major European markets such as Germany, England, France and Holland, in the large market CAP stock. He has been following the European

markets for the past 32 years. His experience, knowledge and expertise have made him a very conservative stock investor. His investments are essentially exposed in brand name and world-known stocks that are leaders in their respective industries.

Although there is no such thing as zero-risk investments, Ricaldo Zavala's prudent methods and strategies of investment have made him a successful advisor. Ricaldo Zavala would rather preserve the capital of his clients under his management. There is no guaranty for future positive performance.

Item 9 – Disciplinary Information

NOT APPLICABLE

Item 10 – Other Financial Industry Activities & Affiliations

NOT APPLICABLE

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

NOT APPLICABLE

Item 12 - Brokerage Practices

NOT APPLICABLE

Item 13 – Review of Accounts

The accounts are reviewed on a weekly basis.

Item 14 – Client Referrals and Other Compensation

NOT APPLICABLE

Item 15 – Custody

NOT APPLICABLE

Item 16 – Investment Discretion

Ricaldo Zavala only has discretion to buy or sell securities on behalf of his clients, which is based on the power of attorney given by his clients to do so.

Item 17 – Voting Client Securities

NOT APPLICABLE

Item 18 – Financial Information

NOT APPLICABLE

Item 19 – Requirements for State Registered Advisers

NOT APPLICABLE