

GE RATTÉ ASSET MANAGEMENT LLC

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This Brochure provides information about the qualifications and business practices of GE Ratté Asset Management LLC. If you have any questions about the contents of this Brochure, you may contact us at (808) 260-9249 or ellen@geratte.com to obtain answers and additional information. GE Ratté Asset Management LLC (“GE Ratté”) is a registered investment adviser with the Securities and Exchange Commission. Registration of an investment adviser does not imply any level of skill or training. 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 GE Ratté Asset Management LLC. is available on the Securities and Exchange Commission’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This is our revised Brochure. It contains material changes made to our initial Brochure dated January 2, 2014. The material changes are as follows:

- We do not work with pension & profit sharing plans.
- We do not provide business owners the following services: sale, M&A, stock sales/liquidity, and capital market options.
- We do not provide multi-family office services including turn-key family office solutions.

Our Brochure is available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for GE Ratté Asset Management LLC is 106913. We may provide ongoing disclosure information about material changes as necessary and will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting us at (808) 260-9249 or via email to ellen@geratte.com. Our Brochure is provided free of charge.

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Item 4 – Advisory Business

4a: Firm Description

GE Ratté was established in February 2013 by Gregory E. Ratté, CFA. Our main office is located in Honolulu, HI.

4a1: Principal Members

- Gregory E. Ratté, CFA, President: Mr. Ratté can be reached by phone at (808) 260-9249 or by email at greg@geratte.com.
- Ellen Ratté, CFA, Vice President: Ms. Ratté can be reached by phone at (808) 260-9249 or by email at ellen@geratte.com.

4b: Types of Advisory Services

GE Ratté offers investment advisory services to our clients. We tailor our advice and services to your objectives, means and timelines. We will create a document that will define the types of services that we are providing, our role in providing those services to you and how we may carry out those services for you. Client services include:

- Investment Strategies
- Investment Planning
- Investment Policy Statements
- Ongoing Portfolio Monitoring
- Capital Needs Analysis

4c: Client Tailored Relationships and Restrictions

Subject to conflicts of interest disclosed elsewhere in this Brochure, as a fiduciary, we strive to act solely in your best interest. Your portfolio is customized based on your investment objectives. You may make requests or make suggestions regarding the investments made in your portfolio. Trade requests that contradict your investment objectives or are otherwise not in your best interest will not be honored.

4d: Wrap Fee Program

We do not sponsor a wrap fee program.

4e: Assets under Management (AUM)

We, as of April, 2014, have \$122.5 million in discretionary reportable assets under management and \$112.5 million in non-discretionary reportable assets under management for a total of \$235 million assets under management.

Item 5 – Fees and Compensation

5a: Tiered Fee Schedule

Equity and balanced fee schedule:

assets less than or equal to \$5,000,000	1%
assets in excess of \$5,000,000	negotiable

Fixed Income Only Fee Schedule:

assets less than or equal to \$5,000,000	.5%
assets in excess of \$5,000,000	negotiable

ETF Asset Allocator Only Fee Schedule:

all assets .75%

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported are valued at the last reported sale price on the principal market in which they are traded (or, if there are no sales on that date, then at the mean between the closing bid and asked prices on that date). Other readily marketable securities are priced using a pricing service or through quotations from one or more dealers. All other assets are valued at fair value by us, whose determination shall be conclusive. We may modify the terms in this section with at least 30 days prior written notice. Notwithstanding the above, fees are generally negotiable.

Minimum Account Size

We do not have an account minimum. However, we, in our sole discretion, may decline to accept clients with smaller portfolios.

Compensation for our services will be calculated in accordance with the Schedule A of our Investment Advisory Agreement. We may modify the terms of our Investment Advisory Agreement with at least 30 days prior written notice.

5b: Selection of Other Advisors' Fees

We do not select other advisors.

5c: Fee Payment Options

Investment Management Fees

Advisory fees are deducted from your account by the custodian upon receipt of an invoice from us. The invoice we submit shows the amount of fees to be deducted, the value of your assets on which the fees are based, and the specific manner in which the fees are calculated. If there is insufficient cash in your account, securities may be sold to cover our fees.

Advisory fees are paid quarterly in advance. Our fee is equal to the agreed upon rate per annum,

times the market value of the account, divided by four (4). The market value is the sum of the values of all assets in the account, not adjusted by any margin debit. Fees for partial quarters at the commencement or termination of our Investment Advisory Agreement will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the quarter. Quarterly fee adjustments for additional assets received into the account during a quarter or for partial withdrawals will also be provided on the above pro rata basis.

5d: Third Party Fees

You are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees that we charge.

All brokerage commissions, stock transfer fees, and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. You bear the responsibility for verifying the accuracy of fee calculations.

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

We do not charge advisory fees based on the performance of funds or securities in your account.

Item 7 – Types of Clients

We generally provide asset management and financial planning services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Charitable Organizations

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

8a: Analysis

We use multiple sources of information to obtain analysis and strategies. They include sources such as financial newspapers, financial magazines, research prepared by others, corporate rating services, prospectuses, company press releases, annual reports, Wall Street research and filings with the SEC.

8b: Investment Strategies

Our mission is to provide wealth management solutions to individuals and charitable organizations. We focus on customized solutions to preserve, enhance, and, when possible, perpetuate our client's wealth. We are an independent, fee only, privately held company, and our goal is to help our clients to be good stewards of their capital.

We invest the time to understand our clients. We can provide multiple services or single solutions depending on client's objectives, utilizing our internal resources and coordinating with other world class vendors.

Overview of Products & Services

Asset Management

- Portfolio Planning and Allocation
- Core Investment Management
- Strategic Partnerships for Satellite Strategies

Strategic Advice

- Individuals: Tax & Estate Planning
- Foundations/Non-Profits: Consultant Selection, Multi-Manager Coordination

Asset management – Portfolio Planning

Core U.S. Equity

Our core equity strategy is tax aware and based on fundamental analysis of companies with free cash flow, growing markets and strong balance sheets. Our approach is long term with low turnover, as we consider ourselves “Investors” rather than “Traders”. We also consider macro themes such as economic analysis and global trends.

Active Fixed Income Management

Our fixed income approach is characterized by finding high quality issues on the most attractive part of the yield curve. We are active in yield curve (duration) management as well as cash flow management. We will also strategically use exchange-traded fixed income index funds.

International ETF Portfolio

We utilize low cost exchange traded index funds (ETF's) to build inexpensive and liquid global portfolios.

- ETF's are inexpensive – The expenses incurred in managing a fund directly impact the fund's performance. The lower the expense ratio, the less drag on a fund's performance. Low expense ratios are one of the screens we use in selecting our ETF's; our weighted average expense ratio is roughly 24 basis points.
- ETF's are liquid – Because our strategy calls for periodic rebalancing among asset classes, it is important that the instrument we use be liquid and easily tradable. ETF's trade actively on an exchange (the American) just like shares of common stock.
- ETF's provide diversification – Global diversification and asset allocation can be achieved in a very cost effective manner for smaller portfolios as compared to individual securities.

Satellite Strategies

We have strategic relationships with other world class managers to offer satellite strategies that complement our core discipline in emerging markets, international small cap, commodities, real estate emerging market debt high yield debt and alternative investments.

8c: Risk of Loss

All investments include a risk of loss. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use our best efforts and expertise to manage your assets. However, we cannot guarantee any level of performance or that you will not experience financial loss.

We will use our best judgment and good faith efforts in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, economic, political and business risks. Except as may otherwise be provided by law, we will not be liable to you for (a) any loss that you may suffer by reason of any investment decision made or other action taken or omitted in good faith by us with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (b) any loss arising from our adherence to your instructions; or (c) any act or failure to act by a custodian of your account. Nothing in this document shall relieve us from any responsibility or liability we may have under state or federal statutes.

Item 9 – Disciplinary Information

We do not have any legal, financial or other “disciplinary” items to report to you. We are obligated to disclose any disciplinary event that would be material to you when evaluating us and our employees.

Item 10 – Other Financial Industry Activities and Affiliations

10a: Broker Dealers and Registered Representatives

We are not registered as a broker-dealer and our employees are not registered representatives of any broker-dealer.

10b: Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither GE Ratté nor its employees hold any of the above registrations.

10c: Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither GE Ratté nor its employees has any relevant registration relationships that are material to this advisory business.

10d: Selection of Other Advisors or Managers and How this Advisor is Compensated for those Selections

We do not select other advisors.

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

11a: Code of Ethics Description

As an SEC-registered adviser, we have adopted a code of ethics pursuant to SEC Rule 204A-1. In addition, we claim compliance with the CFA Institute Asset Manager Code of Professional Conduct. This claim has not been verified by CFA Institute. In addition, we adhere to CFA Institute Code of Ethics & Standards of Professional Conduct. Copies of the codes can be found at www.cfainstitute.org/ethics. The codes of ethics govern a number of potential conflicts of interest we may have when providing our advisory services to you. This code of ethics is designed to ensure that we meet our fiduciary obligation to you and to stress the importance of a culture of compliance within our firm.

11b, c & d: Participation or Interest in Client Transactions

GE Ratté, and/or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for our clients. We do not buy or sell from our accounts before we buy or sell from our clients' accounts. In some cases GE Ratté, or its employees, may buy or sell securities for our own accounts and not for clients' accounts, as it may not meet the objectives or plans for the client.

We attempt to maintain full disclosure with our clients so that you can make informed decisions. We evaluate our activity from the view of our clients to ensure that any and all required disclosures are made. For example, we will disclose anything that would cause you to be unfairly influenced to make any decision regarding actions or inactions in your account.

Item 12 – Brokerage Practices

12a: Selecting Brokerage Firms

With the exception of being deemed to have custody for directly deducting client Advisory fees from their custodial account, we do not maintain custody of your assets that we manage. Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We are independently owned and operated and not affiliated with any of the custodians with which we work. The custodians will hold your assets in a brokerage account and buy and sell securities when we instruct them to. You may keep your existing custodian or we may recommend one for you. Should you accept our recommendation, you will enter into an account agreement directly with them. We do not open the account for you.

How We Select Brokers/Custodians to Recommend

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- capability to execute, clear and settle trades (buy and sell securities for your account)
- capabilities to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- breadth of investment products made available (stocks, bonds, mutual funds, exchange traded funds (ETFs), etc.)
- availability of investment research and tools that assist us in making investment decisions
- quality of services
- competitiveness of the price of those services (commission rates, other fees, etc.) and willingness to negotiate them
- reputation, financial strength and stability of the provider
- their prior service to us and our other clients
- availability of other products and services that benefit us, as discussed below (and Item 14)

Recommending a broker-dealer may create a conflict of interest. Accordingly GE Ratté has established the following restrictions in order to ensure its fiduciary responsibilities:

- A director, officer, associated person, or employee of GE Ratté shall not buy or sell securities for her/his personal portfolio where her/his decision is substantially derived, in whole or in part, by reason of her/his employment unless the information is also available to the investing public or reasonable inquiry. No person of GE Ratté shall prefer her/his own interest to that of the advisory Client.
- We maintain a list of all securities holdings held by us and anyone associated with us that has access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer of GE Ratté.
- We emphasize your unrestricted right to select and choose your own broker /dealer.
- We require that all employees and independent contractors associated with us act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- Any employee or independent contractor associated with us that violates any applicable federal or state regulation governing registered investment advisory practices may be subject to termination.

Trade Aggregation

We are authorized to aggregate purchases and sales and other transactions made for your account with purchases and sales and other transactions in the same or similar securities or instruments for other clients of ours. When we aggregate transactions, the actual prices applicable to the aggregated transactions will be averaged, and the account will be deemed to have purchased or sold its proportionate share of the securities or instruments involved at the average price obtained. Stock exchange regulations may in certain instances prevent the executing broker-dealer from delivering to the account a confirmation slip with respect to its participation in the aggregated transaction and, in such event, we will advise you in writing of any purchase or disposition of instruments for the account with respect to any such aggregated transaction. We will direct that confirmations of any transactions effected for the account be sent, in conformity with applicable law, to you.

Item 13 – Review of Accounts

13a: Periodic Reviews

Accounts are reviewed by Gregory E. Ratté, CFA or other qualified staff members. All reviews are either conducted or supervised by Gregory E. Ratté. The frequency of reviews is determined based on your investment objectives, but no less than quarterly. Generally the maximum number of accounts assigned to a reviewer is 75.

13b: Review Triggers

More frequent reviews of your accounts may be triggered by changes in your investment objectives, tax considerations, large deposits or withdrawals, large sales or purchases, and/or changes in the economic climate.

13c: Regular Reports

All investment advisory clients receive quarterly reports on representative investments recommended specifically by GE Ratté.

Investment advisory clients also receive standard account statements from the custodian of their accounts on a monthly basis.

Item 14 – Client Referrals and Other Compensation

14a: Economic Benefits Provided by Third Parties for Advice Rendered to Clients

We may receive software, tools, training programs or seminar services from our custodians and/or broker dealers. Additionally, they may provide these non-financial benefits to us as a benefit for using the broker-dealer's services. However, we endeavor at all times to put the interests of our clients first. You should be aware, however, that the receipt of the types of benefits discussed above can create a potential conflict of interest thereby influencing our choice of a custodian.

14b: Compensation to Non-Advisory Personnel for Client Referrals

We do not directly or indirectly compensate any person for client referrals.

Item 15 – Custody

Our clients' accounts are held by a qualified custodian. Except to withdraw fees, we do not have custody of the assets in the account and shall have no liability for any loss or other harm to any property in the account. This includes harm resulting from the insolvency of the custodian or any acts of the agents or employees of the custodian. We cannot ensure that when harm is caused whether or not the full amount of loss is covered by the Securities Investor Protection Corporation ("SIPC") or any other insurance which may be carried by the custodian. SIPC provides only limited protection for the loss of property held by a broker-dealer.

Item 16 – Investment Discretion

We offer advisory services on a discretionary basis. Discretionary authority allows us to execute investment recommendations in accordance with the investment policy statement (or similar document used to establish each Client's objectives and suitability), without the Client's prior approval of each specific transaction. Under this authority, clients allow us to purchase and sell securities and instruments in their account(s), arrange for delivery and payment in connection with the foregoing, select and retain sub-advisors, and act on behalf of the client in matters necessary or incidental to the handling of the account, including monitoring certain assets.

In certain circumstances, we will request non-discretionary authority over our clients' accounts. Non-discretionary authority requires us to obtain your prior approval of each specific transaction prior to executing investment recommendations.

Item 17 – Voting Client Securities

Unless specifically directed otherwise in writing by you, we do not receive and vote proxies or receive annual reports on issues held in your account(s). The custodian will send all expected proxy and report information directly to you.

Item 18 – Financial Information

18a: Financial Condition

We have no financial issues that could impair our ability to carry out our fiduciary duty to our clients. We have not been the subject of a bankruptcy petition.

We do not require prepayment of more than \$500.00 in fees from clients more than six (6) months in advance of services.