

Rock Street Capital, LLC
Form ADV Part 2 – Disclosure Brochure
Effective: July 29, 2014

Item 1

This Brochure provides information about the qualifications and business practices of Rock Street Capital, LLC.

If you have any questions about the contents of this Brochure, please contact Rock Street Capital, LLC at (808) 344-9033

This brochure provides information about the qualifications and business practices of Rock Street Capital, LLC. If you have any questions about the contents of this brochure, please contact us at (808) 344-9033. 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 Rock Street Capital, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Rock Street Capital, LLC
CRD No: 172359
115 East Lipoa St. #201
Kihei, HI, 96753
Phone: (808) 344-9033
<http://www.rockstreetcapital.com>

Item 2 - Material Changes

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the "Advisers Act"). The amendments are designed to require a registered investment Advisor to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor's business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts, Part 2A and Part 2B. Part 2A of the new Form (the "Firm Brochure") provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. Part 2B of the new Form (the "Brochure Supplement") requires an Advisor to provide information about certain advisory personnel. Rock Street Capital, LLC strives to provide you with the complete and accurate information at all times. We encourage all current and prospective investors to read this Brochure and call Rock Street Capital, LLC to discuss any questions you may have.

Future Changes

From time to time, Rock Street Capital, LLC may amend this Firm Brochure to reflect changes in business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Firm Brochure or this summary of Material Changes shall be provided to each Client annually or if a material change is made. At any time, you may view the current Firm Brochure on-line at the SEC's Investment Advisor Public Disclosure website at <http://advisorinfo.sec.gov>.

To review the firm information for Rock Street Capital, LLC

- Click Investment Advisor Search in the left navigation menu.
- Select the option for Investment Advisor Firm and enter 172359 (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- ADV Part 1 will be displayed.
- This will provide access to Form ADV 1 and 2A.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions.
- On the left navigation, Form ADV Part 2A is located near the bottom.

You may also request a copy of this Firm Brochure at any time, by contacting Rock Street Capital, LLC

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Item 4 – Advisory Services

A. Firm Information

Rock Street Capital, LLC is an LLC registered with the State of Hawaii since December 2nd, 2013.

Principle Ownership: Eric James 60%

Martin Williams 40%

B. Advisory Services Offered

Advisor manages stock and option investments in volatility and stock market index ETFs(exchange traded funds) & ETNs(exchange traded notes) that allow market timing.

C. No tailored advisory services

Rock Street Capital, LLC manages investment funds under a single market timing investment plan. The Advisor does not tailor advisory services to the individual client. Prior to rendering investment management services, Rock Street Capital, LLC will ascertain, in conjunction with the Client, that the Client's financial situation, risk tolerance, and investment objective are consistent with assigning a portion of the client's assets to a speculative market timing investment program. All client accounts are handled in the same manner having similar positions and transactions. Client accounts that might request restrictions on investing in certain securities or types of securities are not accepted.

Prior to engaging Rock Street Capital, LLC to provide investment advisory services, the Client is required to enter into an investment management agreement with Rock Street Capital, LLC acknowledging that all funds placed under management of the advisor are speculative funds and setting forth the terms and conditions of the engagement and the services to be provided.

D. The advisor does not participate in wrap fee programs.

E. Rock Street Capital, LLC does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Rock Street Capital, LLC to direct trades to this Custodian as agreed in the Investment Advisory Agreement. Further, Rock Street Capital, LLC does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Rock Street Capital, LLC directs trades to the Custodian on a discretionary basis. As of July 29, 2014, the Advisor has approximately \$0 of client assets under management.

Item 5 - Fees and Compensation

A. Compensation for advisory services. Advisor charges an annual fee of 2% of assets under management payable as 1/4 of 2% of the calendar quarter ending balance or prorated on a daily basis. Rock Street Capital, LLC reserves the right, in its sole discretion, to negotiate, reduce or waive the advisory fee for certain Client Accounts for any period of time determined by Rock Street Capital, LLC. In addition, Rock Street Capital, LLC may reduce or waive its fees for the Accounts of some Clients without notice to, or fee adjustment for, other Clients.

B. Advisor fees are deducted from the client accounts. Fees are not charged in advance. Currently, all client accounts are held at Interactive Brokers. Accounts at Interactive Brokers have fees calculated and charged after the end of the calendar quarter. All securities held in a portfolio managed by Rock Street Capital, LLC will be independently valued by the Custodian. Rock Street Capital, LLC will not have the authority or responsibility to value portfolio securities.

Clients will receive independent statements from the Custodian no less frequently than quarterly. It is the responsibility of the client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility.

C. Other fees

Accounts held at Interactive Brokers incur brokerage and other transaction costs. Clients that have an account at Interactive Brokers should review Item 12 on Brokerage practices.

D. Client fees are not charged in advance.

E. Asset based service fees.

The advisor does not receive commissions or markups on the client accounts.

Item 6 – Performance-Based Fees

Rock Street Capital, LLC receives performance-based fees for its investment management services. These services are only offered to accredited investors. A performance-based fee is an asset manager's fee for managing a client's account in which Rock Street Capital, LLC's compensation is based upon the net or gross returns of the account being managed compared to the previous high water mark on that account. When calculating net or gross returns, performance-based fees may be based on absolute or benchmark relative returns. In certain instances, we may negotiate performance-based fees with specific clients.

Side-by-side Management – Client Portfolios will not necessarily be managed identically at all times. Specifically, it is not required that we use the same investment practices consistently across all portfolios. Although we manage numerous portfolios with similar or identical investment objectives, or may manage accounts with different objectives that trade in the same securities, the portfolio decisions relating to these accounts and the performance resulting from these decisions, may differ from portfolio to portfolio. Each account's performance may also differ due to differences in investment restrictions, tax considerations, cash flows, trade rotation, etc.

The simultaneous management of different client accounts, with different fee structures, creates certain conflicts of interest, as the fees for the management of some client types are higher than for others. Nevertheless, when managing the assets of these accounts, we have a duty to treat all accounts fairly and equitably over time.

Item 7 – Types of Clients

Rock Street Capital, LLC may provide services to a variety of client types. Clients may include: Private investors, High net worth individuals, and Qualified Institutions/Organizations with private capital to invest.

The relative percentage each client type currently represents is available on Rock Street Capital, LLC's Form ADV Part 1. The actual mix of types of Clients changes over time based upon market conditions, business plans and other factors. Rock Street Capital, LLC is committed to providing services to qualified investors, regardless of legal or corporate status. The advisor does not have a minimum account size.

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

A. Methods of Analysis

Rock Street Capital, LLC draws all necessary information for developing its investment models and strategies from its own proprietary research. This research considers

- Fundamental Analysis • Economic Analysis • Technical Stock Market Analysis

Investing in securities involves risk of loss that clients should be prepared to bear.

B. The advisor follows a market timing strategy where the goal is to be profitable in both rising and falling markets by having accounts hold long positions or short positions. Such positions might include funds that represent leveraged positions. The risks of loss of a market timing strategy could be considerable and the advisor requires the client to only place speculative funds under its management.

C. The advisor primarily has the client funds invested in options on stock market index & volatility instruments. Such funds will represent either a net long position in the market or a net short position in the market. Such funds may use leverage to increase the exposure to two times the index, long or short. The use of long and short index funds, with leverage involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

Rock Street Capital, LLC and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Background information is available on the Investment Advisor Public Disclosure website at <http://advisorinfo.sec.gov>.

To review the firm information for Rock Street Capital, LLC, click Investment Advisor Search in the left navigation menu and enter, select the option for Investment Advisor Firm and enter 172359 (our firm's CRD number) in the field labeled "Firm IARD/CRD Number:". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

There are no legal, regulatory or disciplinary events involving Rock Street Capital, LLC.

Item 10 – Other Financial Activities and Affiliations

A. Rock Street Capital, LLC does not have any affiliations with a broker-dealer.

B. Rock Street Capital, LLC is not registered, and does not have any pending registrations as a futures commission merchant, commodity pool operator, a commodity trading advisor.

C. There is no relationship or arrangement that is material to our advisory business or to our *clients* that we or any of our *management persons* have with any *related person* listed below.

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor
5. banking or thrift institution
6. accountant or accounting firm
7. lawyer or law firm
8. insurance company or agency
9. pension consultant
10. real estate broker or dealer

11. sponsor or syndicator of limited partnerships.

D. The advisor does not recommend or select other investment advisers for clients

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

A. Rock Street Capital, LLC has implemented a Code of Ethics that defines our fiduciary commitment to each Client. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Rock Street Capital, LLC owes a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Rock Street Capital, LLC to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures.

Rock Street Capital, LLC has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (808) 344-9033

B. Personal Trading and Conflicts of Interest

Rock Street Capital, LLC does not have a material financial interest in any investment recommended to clients.

C. The advisor and related persons have investment accounts that make identical investments as the client accounts. This can cause a potential conflict of interest. This is addressed by trading in securities where it is believed that the timing (before or after) any one trade does not have a material or predictable effect on any other single trade because of the large scale of the underlying instruments traded. If it becomes apparent that a direct conflict has shown up, the advisor and related persons yield to the interests of the client accounts.

D. The advisor and related persons have investment accounts that make identical investments as the client accounts. This can cause a potential conflict of interest. This is addressed by trading in securities where it is believed that the timing (before or after) any one trade does not have a material or predictable effect on any other single trade because of the large scale of the underlying instruments traded. If it becomes apparent that a direct conflict has shown up, the advisor and related persons yield to the interests of the client accounts.

Rock Street Capital, LLC or related persons may have an interest or position in certain securities, which may also be recommended to you. At no time, will Rock Street Capital, LLC or any associated person of Rock Street Capital, LLC, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Rock Street Capital, LLC does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Rock Street Capital, LLC to direct trades to this Custodian as agreed in the Investment Advisory Agreement. Further, Rock Street Capital, LLC does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Rock Street Capital, LLC may recommend a Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, and procedures for order entry. Rock Street Capital, LLC does not receive research services, other products, or compensation as a result of recommending a particular broker that may result in the Client paying higher commissions than those obtainable through other brokers.

Rock Street Capital, LLC recommends to US Clients that they established their brokerage account[s] at Interactive Brokers.

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. Rock Street Capital, LLC does not participate in soft dollar programs sponsored or offered by any broker-dealer.

2. Brokerage Referrals - Rock Street Capital, LLC does not receive any compensation from any entity in connection with the recommendation for establishing a brokerage account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Rock Street Capital, LLC will place trades within the established account[s] at the Custodian designated by the Client. Further all Client accounts are traded within their respective brokerage account[s]. Rock Street Capital, LLC will not engage in any principal transactions (i.e., trade of any security from or to Rock Street Capital, LLC's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Rock Street Capital, LLC will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Rock Street Capital, LLC will execute its transactions through an unaffiliated broker-dealer selected by the Client. Rock Street Capital, LLC may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer/mutual fund company for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Investment Advisory Clients – Accounts are monitored on an ongoing basis by Rock Street Capital, LLC for adherence to investment strategy. Investment management and supervision over the securities contained in the Client's portfolio are performed in an ongoing basis by Rock Street Capital, LLC, as applicable.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A, each Client account shall be reviewed at least quarterly. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Rock Street Capital, LLC if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Trustee or Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor also prepares an annual review of the managed accounts.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Rock Street Capital, LLC

Rock Street Capital, LLC does not enter into referral agreements with third-party advisors under which the third-party advisor pays a fee to Rock Street Capital, LLC for client referrals as permitted by Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended.

B. Client Referrals from Solicitors

The Advisor may pay compensation to Broker-Dealers, Investment Advisers, or other qualified persons/entities for referral services a portion of the fees charged by the Advisor in an amount no greater than 20.00% of the total investment management fee (including performance fee) that the Advisor charges the client. No payment will be paid to a referring Broker-Dealer or referring Investment Advisor without delivery to Applicant Investment Adviser of a client signed and dated acknowledgement of receipt of a Broker-Dealer Investment Advisor Solicitor Disclosure Statement complying with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940, as amended, regarding the payment of solicitation fees to an unaffiliated person for referring or soliciting prospective clients on behalf of the registered investment adviser.

The payment of a solicitation fee will not affect the amount being charged by the Applicant Investment Adviser. The solicitation fee shall be paid solely from the Applicant Investment Adviser's standard investment management fee and shall not result in any additional charge to the client. The Investment Adviser's fee would be the same, regardless of whether a solicitation fee is paid.

Rock Street Capital, LLC does not presently pay any solicitors to refer business to Rock Street Capital, LLC. Rock Street Capital, LLC may receive a Client referral from a third-party. No compensation is given for the referral. All referrals are a professional courtesy and in the interest of the Client.

Item 15 – Custody

Rock Street Capital, LLC does not accept or maintain custody of any Client accounts. All Clients must place their assets in a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct Rock Street Capital, LLC to utilize that custodian for the Client's security transactions. For more information custodians and brokerage practices, see Item 12 - Brokerage Practices.

While Rock Street Capital, LLC does not have custody of Client funds or securities, payments of fees may be paid by the custodian from the custodial brokerage account that holds Client assets. In certain jurisdictions this may be deemed constructive custody. Prior to permitting direct debit of fees each Client provides written authorization permitting fees be made direct from the custodian. Unless the custodian, under agreement with the client, calculates the fee daily, Rock Street Capital, LLC will send the custodian a quarterly bill showing the amount of the fee and the way in which it was calculated. The custodian sends every Client an account statement not less than quarterly showing all account activity, including the amounts disbursed from the account to Rock Street Capital, LLC.

Item 16 – Investment Discretion

Discretionary Portfolio Management – Rock Street Capital, LLC generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Management Agreement containing all applicable limitations to such authority. All discretionary trades made by Rock Street Capital, LLC will be in accordance with the Advisor's stated investment objectives and goals as it relates to the client's speculative funds placed under management.

Item 17 – Voting Client Securities

Rock Street Capital, LLC does not accept proxy voting responsibility for any Client. Therefore, although Rock Street Capital, LLC may provide investment advisory services relative to Client investment assets, Rock Street Capital, LLC 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. Rock Street Capital, LLC and/or the Client shall correspondingly instruct the Custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

Item 18 – Financial Information

Neither Rock Street Capital, LLC, nor its management has any adverse financial situations that would reasonably impair the ability of Rock Street Capital, LLC to meet all obligations to its Clients. Neither Rock Street Capital, LLC, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Rock Street Capital, LLC is not required to deliver a balance sheet along with this brochure as the firm does not collect advance fees more than \$1,200 per client for services to be performed six months or more in advance. Rock Street Capital, LLC charges fees on a Quarterly or daily basis as of the end of the period. Rock Street Capital, LLC does not charge in advance for services. Please see Item 5 - Fees and Compensation for additional information.

Item 19 – Requirements for State-Registered Advisors

The formal education and business background of Eric James and other business activities and the amount of time spent in those activities is presented in Form ADV Part 2B – Individual Disclosure Brochure For Eric James. The formal education and business background of Martin Williams and other business activities and the amount of time spent in those activities is presented in Form ADV Part 2B – Individual Disclosure Brochure For Martin Williams.

Privacy Policy Effective: May 1, 2014

Our Commitment to You

Rock Street Capital, LLC is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Rock Street Capital, LLC (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust. We do not sell your non- public personal information to anyone. Nor does Rock Street Capital, LLC provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

- Name and address • Assets
- E-mail address • Income
- Phone number • Account balance
- Social security or taxpayer identification number
- Investment activity
- Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That Rock Street Capital, LLC Shares

Rock Street Capital, LLC works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Rock Street Capital, LLC's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients

Rock Street Capital, LLC does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (808) 344-9033

Form ADV Part 2B – Individual Disclosure Brochure
For Eric James
Effective: July 29, 2014

This brochure supplement provides information about Eric James that supplements the Rock Street Capital, LLC firm brochure. You should have received a copy of that brochure. Please contact Rock Street Capital, LLC at (808) 344-9033, if you did not receive Rock Street Capital, LLC firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Eric James is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

Eric James is currently one of two advisors to clients. Eric was born in 1982. After high-school Eric attended Colorado Film School's film studies certificate program which is the extent of his post-high school formal education. Eric is self-taught in the areas of Business and Finance. In addition to his role at Rock Street Capital, LLC, He currently holds the position of Founder & CTO of PosterBrain, LLC, a Colorado based LLC that specializes in the printing industry. This position does not require an minimum qualification to achieve this designation. Eric spends less than 50% of his time in this business activity. Eric also currently holds the position of managing member of Alpha Investment Management, LLC, a Colorado based LLC that specializes in investment management. This position does not require a minimum qualification to achieve this designation. Eric spends less than 50% of his time in this business activity.

Item 3 – Disciplinary Information

Rock Street Capital, LLC and its advisory personnel value the trust you place in us. As we advise all clients, we encourage you to perform the requisite due diligence on anyone providing services to you. There are no legal or disciplinary events to disclose regarding Eric James.

However, we do encourage you to independently view the background of Eric James on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

Item 4 – Other Business Activities

Mr. James dedicates the necessary piece of his business time serving the needs of the advisory Clients of Rock Street Capital, LLC. Mr. James shares all investment advisory and administrative functions within Rock Street Capital, LLC. Mr. James also has a subscription-based newsletter providing information about the stock and options markets. Eric spends less than 50% of his time in this business activity. This activity makes up less than 10% of the Mr. James's income. In addition, Eric currently holds the position of managing member of Alpha Investment Management, LLC, a Colorado based LLC that specializes in investment management. Eric spends less than 50% of his time in this business activity. This activity makes up less than 10% of the Mr. James's income.

Item 5 – Additional Compensation

Mr. James is compensated solely by Rock Street Capital, LLC for the services provided to Clients. Mr. James does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of Rock Street Capital, LLC.

Item 6 – Supervision

Mr. James serves as an investment advisory representative of Rock Street Capital, LLC, as well as sharing in operational and administrative functions. Mr. James's may be contacted directly at (303) 521-3561.

Rock Street Capital, LLC has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Rock Street Capital, LLC. Further, Rock Street Capital, LLC is subject to regulatory oversight by various agencies. These agencies require registration by Rock Street Capital, LLC and its employees. As a registered entity, Rock Street Capital, LLC is subject to examinations by regulators, which may announced or unannounced. Rock Street Capital, LLC is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.

Form ADV Part 2B - Individual Disclosure Brochure
For Martin Williams
Effective: July 29, 2014

This brochure supplement provides information about Martin Williams that supplements the Rock Street Capital, LLC firm brochure. You should have received a copy of that brochure. Please contact Rock Street Capital, LLC at (808) 344-9033, if you did not receive Rock Street Capital, LLC firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Martin Williams is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Martin Williams is currently one of two advisors to clients. Martin was born in 1976. After high-school Martin attended the University of Alabama where he received a degree in finance. After graduation Martin served an extended tour with the Peace Corps in Bolivia where he initiated a successful micro-credit program in conjunction with several NGO's providing essential social services. In addition to his role at Rock Street Capital, LLC, He currently holds the position of Founder & CEO of MCW LLC dba, Maui Condo And Car, a Hawaii based LLC that specializes in vacation rental property management with over \$50M of property under management. This position does not require a minimum qualification to achieve this designation. Martin spends less than 50% of his time in this business activity.

Item 3 - Disciplinary Information

Rock Street Capital, LLC and its advisory personnel value the trust you place in us. As we advise all clients, we encourage you to perform the requisite due diligence on anyone providing services to you. There are no legal or disciplinary events to disclose regarding Martin Williams.

However, we do encourage you to independently view the background of Martin Williams on the Investment Adviser Public Disclosure website at <http://adviserinfo.sec.gov>.

Item 4 - Other Business Activities

Mr. Williams dedicates the necessary piece of his business time serving the needs of the advisory Clients of Rock Street Capital, LLC. Mr. Williams shares investment advisory and administrative functions within Rock Street Capital, LLC.

Item 5 - Additional Compensation

Mr. Williams is compensated solely by Rock Street Capital, LLC for the services provided to Clients. Mr. Williams does not receive any additional compensation or economic benefit from any unaffiliated person, company or organization in connection with the services provided to Clients of Rock Street Capital, LLC.

Item 6 - Supervision

Mr. Williams serves as an investment advisory representative of Rock Street Capital, LLC, as well as sharing in operational and administrative functions. Mr. Williams may be contacted directly at (808) 344-9033.

Rock Street Capital, LLC has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Rock Street Capital, LLC. Further, Rock Street Capital, LLC is subject to regulatory oversight by various agencies. These agencies require registration by Rock Street Capital, LLC and its employees. As a registered entity, Rock Street Capital, LLC is subject to examinations by regulators, which may be announced or unannounced. Rock Street Capital, LLC is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.