



OPTIMA CAPITAL  
MANAGEMENT, INC.  
Registered Investment Advisor

# Optima Capital Management, Inc.

## Form ADV Part 2 Brochure

This Brochure provides information about the qualifications and business practices of Optima Capital Management, Inc. If you have any questions about the contents of this Brochure, please contact us at (210) 497-4488. 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 Optima Capital Management, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Optima Capital Management, Inc. is 111409.

Optima Capital Management, Inc. is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

19134 Stone Oak Parkway, Suite 200

San Antonio, TX 78258

Phone: (210) 497-4488

Fax: (210) 497-4646

[www.optima-capital.com](http://www.optima-capital.com)

Brochure prepared on March 15, 2011

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This brochure dated March 15, 2011 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We 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 Luis Montes De Oca, President and Chief Compliance Officer at (210) 497-4488 or [lmo@optima-group.com](mailto:lmo@optima-group.com).

Additional information about our firm is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with Optima Capital Management, Inc. who are registered, or are required to be registered, as investment adviser representatives.

## **Table of Contents**

<b>Advisory Business .....</b>	<b>1</b>
<b>Fees and Compensation.....</b>	<b>2</b>
<b>Performance-Based Fees and Side-By-Side Management .....</b>	<b>4</b>
<b>Types of Clients .....</b>	<b>4</b>
<b>Methods of Analysis, Investment Strategies and Risk of Loss .....</b>	<b>4</b>
<b>Disciplinary Information .....</b>	<b>6</b>
<b>Other Financial Industry Activities and Affiliations .....</b>	<b>6</b>
<b>Code of Ethics, Participation in Client Transactions and Personal Trading.....</b>	<b>6</b>
<b>Brokerage Practices .....</b>	<b>8</b>
<b>Review of Accounts .....</b>	<b>11</b>
<b>Client Referrals and Other Compensation.....</b>	<b>12</b>
<b>Custody .....</b>	<b>12</b>
<b>Voting Client Securities.....</b>	<b>13</b>
<b>Financial Information .....</b>	<b>13</b>
<b>Brochure Supplement</b>	

## **Advisory Business**

Optima Capital Management, Inc. ("Optima Capital", "we" or the "firm") provides investment advice, consulting and portfolio management services on a continuing basis, including the appropriate allocation of managed assets with the selection of specific securities which will provide proper diversification and help meet the client's stated investment objectives.

These services include:

- Advice on the design of a personal "Investment Strategy" based on the client's individual profile.
- Implementation and daily management of the investment portfolio in order to OPTIMIZE total returns and/or growth.
- Private financial and market advisory services.
- Preparation of a monthly consolidated investment position report in order to review and manage the portfolio with a global approach.
- Constant review and analysis of investment instruments and opportunities in the international financial markets in order to take advantage of those which may match with our client's individual investment profile.

Our investment philosophy seeks to strike that difficult balance between OPTIMUM investment performance and asset preservation, at the lowest possible risk level.

This corporate philosophy is adapted to meet each client's investment objectives. Individual investment objectives form the basis of any investment strategy, for which only, after several meetings to clearly understand your individual objectives, are we in a position to assist in the development of the personal "Investment Strategy."

In defining investment objectives, key issues include:

- Income/Growth: Current income, capital growth or a combination of both must be clearly defined.
- Risk Level: The basic rule - the greater the potential return or growth, the greater the level of risk.
- Term: This refers to the specified time span over which to invest the portfolio, be it short, medium or long term.

- **Currency:** The choice of currency in which to invest, or a combination of currencies in order to achieve a greater diversification.

One of our tasks is to continuously monitor and review our client's "Investment Strategy" in order to adjust it to the dynamics of the market to always meet individual investment objectives.

Optima Capital is a corporation controlled by Luis Montes De Oca and has provided investment advice and portfolio management services since 1995. The shareholder of the firm is Luis Montes De Oca.

Our assets under management as of year-end 2010 are \$ 163,767,251 on a discretionary basis and \$ 0 on a non-discretionary basis.

## **Fees and Compensation**

Management fees are charged on an annualized basis based on the account ending value at the last day of each month. Management fees are 1.00% and are negotiable. The annualized management fee is payable monthly and calculated on the following basis: month end closing total market value of the account, multiplied by the Annualized Management Fee, divided by twelve (12), with the minimum fee of \$25.00 per month. A one-time, non-recurring and non-refundable set-up fee of \$250.00 will be added to the first invoice. Such fees will be deducted from client's account(s) monthly following the ending of the month for which said fees were incurred. No fees are charged in advance of services being provided. The type of assets under management in general terms shall include, among others, the following: (i) fixed income investments [CDs, Bonds, Notes (Corporate or Sovereign), Structured Debt Issues, etc.] and (ii) variable investments [Stocks, Warrants, Options, Mutual Funds, Structured Products, Annuities, etc] at the market value of the investments. Such investments may be in US Dollars or other currencies. The market value of the investments shall be calculated as per the custodian firm valuations or using a reliable third party pricing source.

To the extent mutual funds are selected the annual advisory fee set forth above does not include fees and expenses associated with investing in mutual funds or other costs of establishing and maintaining an account with mutual funds including Rule 12b-1 fees and expenses. In addition to the annual advisory fee each mutual fund in which your assets are invested will incur separate investment advisory fees and other expenses for which you will bear a proportionate share.

## **Termination**

Either party may terminate upon 30 days written notice. Since fees are paid in arrears, no proration of fees will occur upon termination of the agreement, however a final fee will be charged which will be prorated according to the number of days for which we provided our investment advisory services during the current month. A \$250.00 termination fee will be charged to the client.

## **Fee Payment Options**

As indicated in our advisory agreement with you, you may pay for our services by direct debit. At the inception of the relationship and each quarter thereafter, we will notify your custodian of the amount of the fee due and payable to us through our fee schedule and contract. The custodian does not validate or check our fee, its calculation on the assets on which the fee is based. They will “deduct” the fee from your Account(s) or, if you have more than one account from the account you have designated to pay our advisory fees. Each month, you will receive a statement directly from your custodian showing all transactions, positions and credits / debits into or from your account; the statements after the quarter end will reflect these transactions, including the advisory fee paid by you to us.

## **Additional Fees and Expenses**

Advisory fees payable to us do not include all the fees you will pay when we purchase or sell securities for your Account(s). The following list of fees or expenses are what you pay directly to third parties, whether a security is being purchased, sold or held in your Account(s) under our management. Fees charged are by the broker dealer / custodian.

We do not receive, directly or indirectly any of these fees charged to you. They are paid to your broker, custodian or the mutual fund or other investment you hold. The fees include:

- Brokerage commissions;
- Transaction fees;
- Exchange fees;
- SEC fees;
- Advisory fees and administrative fees charged by Mutual Funds (MF), Exchange Traded Funds (ETFs)
- Advisory fees charged by sub-advisers (if any are used for your account);
- Custodial Fees;
- Deferred sales charges (on MF or annuities);
- Odd-Lot differentials;
- Deferred sales charges (charged by MFs);
- Transfer taxes;

- Wire transfer and electronic fund processing fees;
- Commissions or mark-ups / mark-downs on security transactions ;
- Among others that may be incurred.

In addition, we do not have or employ any employee that receives (directly or indirectly) any compensation from the sale of securities or investments that are purchased or sold for your account or to which we provide consulting expertise or services. As a result, we are a fee only investment adviser. We do not have any potential conflicts of interest present that relate to any additional (and un-disclosed) compensation from you or your assets that we manage.

### **Performance-Based Fees and Side-By-Side Management**

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

### **Types of Clients**

We provide our advisory services to:

- Individuals, including high net worth individuals
- Trusts, estates and charitable organizations
- Corporations or other business entities

### **Methods of Analysis, Investment Strategies and Risk of Loss**

#### **Our Investment Strategies**

Our investment strategy is founded on: Diversification, Independence and Objectivity.

Diversification is achieved not only through different types of instruments, but also through different markets, currencies and institutions. Through the network of institutions with whom we operate we are in the OPTIMUM position to offer our clients various instruments, markets and currencies in order to achieve global diversification.

Being an independent investment advisory firm, we are in the OPTIMUM position to offer objectivity in the implementation of our client's "Investment Strategy;" we also avoid any possible conflict of interest in the management of our client's investment accounts.

Optima Capital will manage our client's account on a Non-Discretionary basis. We are not authorized to withdraw funds from the accounts. We are only authorized to manage the accounts within the specific parameters as set in the client's "Investment Strategy," and subject to prior client confirmation of each transaction.

We offer several investment strategies to you and in doing so may invest in a wide range of securities and other financial instruments including:

- Equity securities
- Exchange-listed securities
- Over-the-counter securities
- Securities of foreign issuers (including ADRs, EDRs and GDRs)
- Warrants
- Rights
- Options contracts
- Futures
- Corporate debt
- Commercial paper
- Certificates of deposit
- United States government securities
- Mutual funds

As financial markets and products evolve, we may invest in other instruments or securities, whether currently existing or developed in the future, when consistent with client guidelines, objectives and policies.

### **Security Analysis**

Our security analysis methods include fundamental analysis and technical analysis.

### **Sources of Information**

In conducting security analysis, we utilize a broad spectrum of information, including financial publications, third-party research materials, annual reports, prospectuses, regulatory filings, company press releases, and corporate rating services.

### **Risk of Loss**

All investments in securities include a risk of loss of your principal (invested amount) and any profits that have not been realized (the securities were not sold to "lock in" the profit). As you know, stock markets, bond markets fluctuate substantially over time. 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 will do our very best in the management of your assets; however, we cannot guarantee any level of performance or that you will not experience a loss of your account assets. Investing in securities involves risk of loss that clients should be prepared to bear.

## **Disciplinary Information**

We do not have any legal, financial or other “disciplinary” item(s) to report to you. We are obligated to disclose any disciplinary event that would be material to you when evaluating us to initiate a Client / Adviser relationship, or to continue a Client /Adviser relationship with us. This statement applies to our Firm, and every employee.

## **Other Financial Industry Activities and Affiliations**

### **Affiliated Entities**

**Optima Capital Advisors, LLC (OCA)** – general business, consulting on general items, set up of international companies and trusts, and general non investment advice. These clients could also be advisory clients of Optima Capital.

**Optima Clearing Services, LLC (OCS)** – accounts receivable collection services for non-investment advisory clients.

**Optima Group, Inc. (OG)** – marketing and public relations firm.

## **Code of Ethics, Participation in Client Transactions and Personal Trading**

Optima Capital is in no way restricted as to the investment vehicles it may have access to and we clearly discloses such practices to clients in the Advisor-Client Agreement.

Optima Capital has adopted a Code of Ethics to ensure that securities transactions by Optima Capital employees are consistent with Optima Capital’s fiduciary duty to its clients and to ensure compliance with legal requirements and Optima Capital’s standards of business conduct. A written copy of Optima Capital’s Code of Ethics is available upon request.

## **Participation in Client Transactions**

The Code of Ethics requires that employees obtain prior approval for personal securities transactions and requires transaction confirmation and quarterly reporting of such transactions. We anticipate that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Optima Capital has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Optima Capital, its affiliates and/or clients, directly or indirectly, have a position of interest. Our employees and persons are required to follow Optima Capital's Code of Ethics.

Employees of Optima Capital and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Optima Capital's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Optima Capital's clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with the Firm's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. We will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be noted.

## **Personal Trading**

Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Optima Capital and its clients.

## **Prohibition on Use of Insider Information**

We have also adopted policies and procedures to prevent the misuse of "insider" information (material, non-public information). A copy of such policies and procedures is available to any person upon request.

## **Brokerage Practices**

Optima Capital will supervise and direct the investments of the client accounts subject to such limitations as the client may impose in writing. Optima Capital, without prior consultation with the client, may, (a) direct the purchase, sell, exchange, conversion, and otherwise trade in stocks, bonds and other securities including money market instruments, (b) direct the amount of securities purchased, sold, exchanged, and otherwise traded; (c) place orders for the execution of such securities transactions with third party broker/dealers; and (d) determine the commission rates paid.

Optima Capital will allocate brokerage transactions in a manner it believes to be fair and responsible to its clients, and consistent with client objectives. Adhering to a strict formula will not be practicable given the variation in client objectives and guidelines. Optima Capital does not enter into agreements with any brokers regarding the placement of securities transactions because of the research services they provide.

It is Optima Capital's policy to seek "best execution" (prompt and reliable execution at the most favorable security price) of all portfolio transactions. Optima Capital may place portfolio transactions with a broker or dealer with whom it may pay a commission that is in excess of the commission that another broker or dealer would have charged for effecting that transaction if Optima Capital determines in good faith that such amount of commission was reasonable in relation to the value of the brokerage service provided by such broker or dealer viewed in terms of either that particular transaction or of the overall responsibilities of Optima Capital. Given that some of the client transactions include international trades and such trades are a specialized market in which issues such as liquidity, secondary market, inventory are of crucial value for the transaction.

From time to time Optima Capital may engage in client directed brokerage arrangements with one or more clients. In a client directed brokerage arrangement, a client asks Optima Capital to direct commission business to a particular broker that client selected that has agreed to provide such services to the client. With respect to such client directed brokerage relationships, Optima Capital may not be able to receive best execution for client.

## **Allocation of Investment Opportunities and Orders**

We have adopted the following policies and procedures related to the fair allocation of investment opportunities. These policies are designed to help ensure that each client receives fair and equitable treatment in the investment process:

- Investment ideas and/or research analyst recommendations are equally disseminated among all appropriate investment professionals responsible for selecting investments.
- Transactions in the same security on behalf of more than one client are aggregated to facilitate best execution and to reduce brokerage commissions and/or other costs.

- When orders cannot be aggregated, we employ a trading rotation process that is fair and objective among institutional and private client accounts, managed account sponsors and passively managed accounts.
- Aggregated executions to participating accounts are allocated in a fair, equitable and objective manner and permissible reasons are delineated for deviating from the standard methodology and the related approval requirements.
- IPOs are only allocated to accounts when the issuer meets the investment objectives of participating accounts as well as a review process for allocations.
- Secondary offerings are allocated using our standard methodologies taking into account situations in which securities are allocated by the issuer based on a client's existing holdings.
- Conflicting investment opportunities between short selling and long investing are properly addressed.
- Accounts in which our employees or affiliates have a beneficial interest, or in which Optima Capital Management, Inc. has a conflict of interest, do not receive preferential treatment.

Our allocation procedures differ for each of our equity strategies.

When orders are generated, the decision on which accounts should participate, and in what amount, is based on the type of security or other asset, the present or desired structure of the various portfolios and the nature of the account's goals. Other factors include risk tolerance, tax status, permitted investment techniques and, for fixed-income accounts, the size of the account and settlement and other practical considerations. As a result, we may have different price limits for buying or selling a security in different accounts. Portfolio information systems, portfolio reports and quality control reports permit us to consider these factors as appropriate.

### **Brokerage Selection**

In an effort to achieve best execution, we consider the following factors in selecting brokers:

- Execution capability
- Order size and market depth
- Availability of competing markets
- Trading characteristics of the security
- Availability of accurate information comparing markets
- Quantity and quality of research received from the broker dealer
- Financial responsibility of the broker-dealer
- Confidentiality
- Responsiveness
- Ability and willingness to commit capital
- Availability of accurate information comparing markets

- The technology to process such data
- Other factors that may bear on the overall evaluation of best price and execution

Our order placement specialists are responsible for continuously monitoring and evaluating the performance and execution capabilities of brokers that transact orders for our client accounts to ensure consistent quality executions. In addition, we periodically review our transaction costs in light of current market circumstances, available published statistical analysis as well as other relevant information.

### **Principal vs. Agency Transactions**

We do not participate in principal or agency transactions.

### **Research Services/Soft Dollars**

We do not participate in soft dollar arrangements.

### **Cross Transactions**

Generally, with the exceptions set forth below, it is our policy not to engage in buying or selling of securities from one managed account to another (typically referred to as a “cross trade”). The vast majority of trades made for our client accounts will be executed through the open market.

### **Trading Aggregation Practices**

When we trade the same security in more than one client account, we generally attempt to batch or “bunch” the trades in order to create a “block transaction.” Generally, buying and selling in blocks helps create trading efficiencies, prompt attention and desired price execution. We will place all or substantially all transactions to purchase or sell common stocks with the client’s “directed” broker, when applicable. (See the discussion below entitled, “**Directed Brokerage**”) Whenever possible, we will attempt to batch or aggregate trades for clients who use the same directed brokers in order to create a “block transaction.”

The commission amount and per share commission rate will differ between our clients with directed brokerage relationships due to the dollar value and the size (number of shares) of the trade for each account, and the total relationship between the client and their broker. Because each client may differ in portfolio size, investment objective, equity exposure and the extent of the relationship with their broker, we do not negotiate commission discounts on the block transaction itself.

## **Directed Brokerage**

We may place all or a portion of the transactions with a broker with whom the client has a special advisory or consulting relationship. Such transactions are placed with a broker who may have provided manager selection services, performance measurement services, asset allocation services, or a variety of other consulting or monitoring assistance, all with the specific knowledge and full approval of the client.

We do not maintain agreements with referring brokers regarding our internal allocation of brokerage transactions. However, all or a sizable portion of a particular clients' brokerage transaction business may be directed to a particular broker if the client has directed, agreed or stipulated us to do so. Commissions are not intended to compensate brokers for client referrals.

With regard to client directed brokerage, we are required to disclose that we may be unable to negotiate commissions, block or batch client orders or otherwise achieve the benefits described above, including best execution, if you limit our brokerage discretion. Directed brokerage commission rates may be higher than the rates we might pay for transactions in non-directed accounts. Also, clients that restrict our brokerage discretion may be disadvantaged in obtaining allocations of new issues of securities that we purchase or recommend for purchase in other clients' accounts. It is our policy that such accounts not participate in allocations of new issues of securities obtained through brokers and dealers other than those designated by the client. As a general rule, we encourage each client to compare the possible costs or disadvantages of directed brokerage against the value of the custodial or other services provided by the broker to the client in exchange for the directed broker designation.

## **Review of Accounts**

Accounts are reviewed on a weekly basis, looking for percentage gain or loss of securities and to maintain diversification structure as per each client's investment objectives.

Luis Montes de Oca reviews all accounts with the assistance of support staff. All investment decisions are taken only by Luis Montes de Oca, President, on all accounts.

A monthly consolidated investment report is issued to each client. This report consolidates all investment positions for each client and shows the client his total positions in a manner to assess and evaluate present and future investment strategies in accordance with his individual investment objectives. In addition, all clients receive separate monthly accounting reports from their portfolio custodian detailing all cash and asset transactions and activity.

## **Client Referrals and Other Compensation**

From time to time, Optima Capital may enter into agreements providing for cash compensation to solicitors who secure advisory clients for Optima Capital. These agreements will require that the Solicitor meet the disclosure and other requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940 and provide for the compensation to be paid to the Solicitor by Optima Capital.

## **Custody**

We do not have custody of client assets. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Investment Discretion**

Optima Capital receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold, broker dealer to be used and commission rates to be paid. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities and determining amounts, Optima Capital observes the investment policies, limitations and restrictions of the clients for which it advises.

## **Discretionary Management**

We have discretionary authority to make determinations regarding the securities that are to be bought and sold, as well as the quantities of such securities, for most clients. Such authority is provided in our contract with each client. In many cases, this discretion is subject to mutually agreed upon investment guidelines relative to the client's portfolio. Client investment guidelines may or may not limit the scope of potential investments. As a result, clients can impose restrictions on investing in certain securities or types of securities. Within client guidelines and instructions, the Firm makes decisions as to the nature and quantity of securities to be bought or sold.

**Wrap Account Management**

We do not participate in the management of wrap account programs.

**Voting Client Securities**

Optima Capital shall not take any action or render any advice with respect to the voting of proxies solicited by, or with respect to, the issuers of any securities held in the Accounts.

**Performance Presentation Standards**

We do not participate in performance reporting.

**Financial Information**

Optima Capital does not have any financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.

**Business Continuity Plan**

We have a Business Continuity Plan that addresses how the Firm will respond to events that may disrupt its business. If the main telephone line is inactive, the emergency number is 210-860-8787. If the emergency line is down, please contact your custodian. We will resume operations as quickly as possible (preferably within twenty-four hours) depending on the severity of the business disruption. Our Business Continuity Plan covers data backup and recovery, mission critical systems financial and operational assessments, alternative communications, alternate business locations, regulatory reporting and the assurance of prompt access to funds and securities for our customers. Additional details regarding the firm's Business Continuity Plan are available upon request.

**Privacy Notice To Customers**

We do not disclose nonpublic personal information about our individual clients or former clients except as permitted by law. We restrict access to nonpublic personal information about you (that we may obtain from your account and your transactions) to those employees who



need to know that information to provide products or services to you or to alert you to new, enhanced or improved products or services we provide. We maintain physical, electronic and procedural safeguards that comply with federal standards to safeguard your nonpublic personal information.



OPTIMA CAPITAL  
MANAGEMENT, INC.  
Registered Investment Advisor

**Luis Montes de Oca**

**Optima Capital Management, Inc.**

**19134 Stone Oak Parkway, Suite 200**

**San Antonio, TX 78258**

**Phone: (210) 497-4488**

**Fax: (210) 497-4646**

**[www.optima-capital.com](http://www.optima-capital.com)**

**Brochure prepared on March 15, 2011**

This Brochure Supplement provides information about Luis Montes de Oca, Inc. that supplements Optima Capital Management, Inc.'s Form ADV Part 2A Brochure. Please contact Luis Montes de Oca, President and Chief Compliance Officer if you did not receive Optima Capital Management, Inc.'s Brochure or if you have any questions about the contents of this supplement.

Additional information about Luis Montes de Oca is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Educational Background and Business Experience**

### **Luis Montes De Oca**

Born in 1965

He received a B.A. in International Economics from Trinity University, San Antonio Texas in 1988.

Business background includes the following:

Optima Capital Management, Inc., President/CCO from 07/1995 to present

Optima Capital Advisors, LLC, Managing Member from 06/2001 to present

Optima Clearing Services, LLC, Managing Member from 06/2001 to present

Optima Group, Inc., President from 06/2001 to present

Barclays Private Bank, Investment Manager from 12/1994 to 06/1995

Synergistics Limited, Managing Director from 06/1993 to 12/1994

Consultores Patrimoniales, Managing Director from 08/1991 to 05/1993

Investment Services Corp., Operations Director from 05/1985 to 07/1991

## **Disciplinary Information**

We are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item

## **Other Business Activities**

Luis Montes de Oca is the President of Optima Capital Advisors, LLC. Optima Capital Advisors, LLC is a general business that consults on general items such as the set up of international

companies and trusts, and general non investment advice. These clients could also be advisory clients of Optima Capital.

Luis Montes de Oca is the Managing Member of Optima Clearing Services, LLC. Optima Clearing Services, LLC is a company that provides accounts receivable collection services for non-investment advisory clients.

Luis Montes de Oca is the Managing Member of Optima Group, Inc. Optima Group Inc. is a marketing and public relations firm.

### **Additional Compensation**

Luis Montes de Oca does not receive any additional economic benefit from third parties for providing advisory services.

### **Supervision**

Luis Montes de Oca is the President and Chief Compliance Officer of Optima Capital Management, Inc., therefore, he is responsible for his own supervision and that of all other investment adviser representatives of Optima Capital Management, Inc. He can be contacted at (210) 497-4488.