

Information Brochure

Oasis Capital Management LLC

Last Updated March 31, 2011

(Formerly the SEC form ADV 2)

General Information

Oasis Capital Management LLC (Oasis) provides investment advisory services, primarily to High Net Worth Individuals. The business is located at 3030 Snow Cloud Circle Park City, Utah 84060. Oasis' mailing address is P.O. Box 682350 Park City UT 84068. The US Postal service does not make deliveries to Oasis' physical address. Oasis' phone number is 435-604-0494.

Clients and Services

Oasis' principal business (i.e. what management spends most of its time doing) is providing day to day investment management on a discretionary basis for the portfolios of individuals; including their related Trusts, Estates, etc. The bulk of our individual clients would ordinarily be described by the financial industry as "High Net Worth" individuals. Oasis does not have any minimum investment requirements for accepting clients, however it does impose minimum management fees (see Fees section below) that generally make it unattractive to potential clients with small portfolios.

In addition to its principal business, Oasis manages a private investment vehicle, Oasis Oak Rock Investors LLC. About half of the assets in Oasis Oak Rock Investors LLC were invested by Oasis' advisory clients, with the balance coming from non-client investors.

As an incidental service to clients, Oasis does provide some limited financial planning for advisory clients. Oasis also provides non-investment financial advice to advisory clients on other financial matters if asked.

Fees

Oasis charges fixed monthly fees to its individual clients. These fees are agreed in advance with new clients and reviewed each year for renewal. The minimum fixed fee for a new client is \$350 per month. For clients with larger portfolios, the fixed fee is set as a round monthly amount that on an annual basis is about 0.1% (one tenth of one percent) of the portfolio value. Fees are collected directly from client accounts quarterly in the month after the end of each calendar quarter.

As manager of Oasis Oak Rock Investors LLC, Oasis receives an annual management fee of 0.75% of assets paid monthly by Oak Rock Financial LLC, the underlying company that Oasis Oak Rock Investors LLC holds shares in. In addition Oasis is entitled to incentive fees of 10% of certain profits earned by Oasis Oak Rock Investors LLC.

Oasis receives no fees or commissions from non clients other than the fees related to Oasis Oak Rock investors LLC noted above. It does receive certain services for no cost from Fidelity Investments in return for maintaining some client accounts at Fidelity.

Investment Approach

Oasis would normally be classified as a “Value” investment manager. That means that it selects securities on the basis of its evaluation of the intrinsic value of the security relative to the existing market price for the security. Oasis purchases securities that it believes are likely to generate double digit annual returns over a holding period of at least 3 years in a variety of macro and microeconomic scenarios. Oasis evaluates securities based on the actual stream of cash that the security can be expected to deliver to the investor over the anticipated holding period, and calculates an expected discounted cash flow return for that period.

Oasis is not limited to and particular class of securities. It has purchased all of the following types of securities for one or more clients in the past 3 years:

- Common Stock
- Preferred Stock
- Mutual Funds
- Corporate Bonds or Bond Funds
- US Government Bonds or Bond Funds
- Foreign Stocks or Stock funds
- Municipal Bonds or Bond Funds
- Hedge Funds
- Warrants
- Index and Individual security options
- Closed End Funds
- Exchange Traded Funds
- Privately issued and Restricted Securities
- Commodity Futures or Futures funds

Oasis selects the investments that it believes will give the most attractive risk adjusted returns that meet each individual client’s risk tolerance and income needs.

In order to select securities, Oasis reviews many sources of information including but not limited to public sources including a number of periodicals, and private subscription sources. Oasis never relies entirely on outside recommendations. Each investment selection is independently reviewed and evaluated by Oasis’ principal, Tom Stephens.

Although the vast majority of securities purchased are held for more than a year, occasionally shorter term holding periods occur. Typically a client account will hold about 20-25 individual securities and average 1-2 trades a month.

Education And Background

All investment decisions for Oasis clients are made by Tom Stephens. Mr. Stephens was born May 21, 1952. He holds an AB in economics from Dartmouth College and an MBA in Finance from The Amos Tuck School of Business. At Tuck he was named a Tuck Scholar signifying academic performance in the top 10% of his class. From 1994-2000 Tom was Chairman & CEO of Unilever Arabia a \$500m subsidiary of the global consumer products company. The company had 2000 employees in the 7 countries on the Arabian Peninsula. From 2000-2003 Tom was President of Unilever Bestfoods North Latin America, a \$1 billion group of companies operating in Mexico, Central America, and the Caribbean. Since leaving Unilever, Tom has worked for Oasis.

Other Activities and Affiliations

Oasis has no business activities other than providing Investment advisory services as described above. Oasis is not affiliated with any other Financial institution. Oasis does not provide any compensation to anyone for referring clients.

Potential for Conflicts of Interest

Oasis has a Fiduciary responsibility to its clients. That means that it is ethically and legally obligated to put each client's interests ahead of those of Oasis or its principals. There are a number of instances in Oasis' day to day operations where conflicts of interest could arise. This section does its best to inform clients of where those conflicts could occur and how Oasis manages those situations.

Oasis manages the accounts of its principals and various family members in the same way as it manages portfolios for other clients. It will frequently trade securities for those principals around the same time that it is trading those same securities in the accounts of unrelated clients. In many cases these are open ended mutual funds, and give rise to no conflict of interest regarding front running. Where the securities are traded on a bid-offered basis, and Oasis determines that trades on behalf of clients are appropriate, Oasis policy is to execute unrelated party customer trades either before those of related parties or on a block trade basis where all participants receive the same average price. The securities recommended by Oasis are generally sufficiently liquid that all relevant client needs can be accommodated without a material effect on the market price.

Oasis operates a private investment vehicle, Oasis Oak Rock Investors LLC, which it solicits clients to invest in. Oasis receives compensation for managing this vehicle. Oasis fully discloses to all solicited investors all of its compensation for this vehicle. Oasis principal and his family invested alongside other clients in the vehicle on the same terms.

Oasis' Principal, as a private individual, also manages 2 other investment related LLCs. One is a family investment vehicle established and run as a part of Mr. Stephens' personal estate planning. The other holds one private investment shared with a friend who is also a client of Oasis. Neither vehicle pays any fees to Oasis.

Mr. Stephens or his family members may from time to time hold investment which are not purchased for other clients and may sell from their own accounts shares in securities that are held in client accounts. These investment and sales reflect that fact that Mr. Stephens or his family members financial needs and or investment objectives, time horizons, risk tolerance, or cash needs often differ in material ways from those of other clients. In the same way, it is very unlikely that any two client accounts will hold identical securities at any time.

Mr. Stephens is sometimes offered the opportunity to make private investments. Oasis will always offer the opportunity to invest in those opportunities to qualified clients for whom they are appropriate.

Client Custody, Account Review and Reporting

Client accounts can be managed at a custodian of the client's choosing. Where possible, Oasis prefers to hold client accounts at Fidelity Investments, as the concentration of accounts makes trading and administration easier, but this is not a requirement. Trading for client accounts is done through the broker with custody of the assets at the prevailing rates charged by that broker. Oasis receives no compensation from the brokers for any trade related commissions.

Mr. Stephens reviews each client account at least monthly. The securities held in most client accounts are reviewed daily. At least quarterly, Oasis sends each client a report showing performance in their account for the most recent month, for the year to date, and since portfolio inception. Clients also receive statements directly from the custodian as well as trade confirmations directly from the custodian.

Financial Position

Oasis generally has limited financial assets on hand. At March 31, 2011 Oasis' principal assets were about \$4,000 of cash in banks, about \$15,000 of management fees receivable, and about \$57,000 of legal fee reimbursements receivable from Oasis Oak Rock Investors LLC. The latter was offset by an account payable in an equal amount to Mr. Stephens. Earnings from Oasis are regularly distributed to its members.