

EAST WEST

WEALTH MANAGEMENT HONOLULU • NEW YORK

This brochure provides information about East West Capital Management, LLC dba East West Wealth Management, LLC's ("EWWM") qualifications and business practices. If you have any questions about the contents of this brochure, please contact us at (808) 585-7788 or by email at email@ewwealth.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any State Securities Authority.

Additional information about EWWM is also available at the SEC's website www.adviserinfo.sec.gov (under "investment adviser firm" and type in our Firm name).

We are a Registered Investment Adviser (RIA) Firm. Our registration as an RIA does not imply any level of skill or training. The oral and written communications we provide to you, including this brochure, are for you to evaluate us. Please use this information as factors in your decision to hire us or to continue our business relationship.

MARCH 29, 2011

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ITEM 2 – MATERIAL CHANGES

This brochure, dated March 29, 2011, has been prepared by EWWM to meet new SEC requirements. As a new document, it is different structurally and substantively from our previous brochure. In future filings, this section will only address material changes that have been incorporated since this brochure was released.

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ITEM 4 – ADVISORY BUSINESS

4a: Firm Description

EWWM was established in July 2005 by Gregory E. Ratte. Our main office is located in Honolulu, Hawaii. It also has a branch in New York, New York

4a1: Principal Members

- Gregory E. Ratte, CFA[®], Chief Investment Officer: Mr. Ratte can be reached via phone (808) 585-7788 or email gratte@ewwealth.com
- Bonnie F. Rice, CTFA[®], ChFC[®], Director of Private Client Services : Ms. Rice can be reached via phone (808) 585-7788 or email brice@ewwealth.com

4b: Types of Advisory Services

EWWM offers a variety of 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 precisely define the types of services 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

As a fiduciary, EWWM always acts solely in your best interests. Your portfolio is customized based on your investment objectives. You may make requests or make suggestions regarding the investments made in your portfolio. Restrictions on trading which, in our opinion, are not in your best interest cannot be honored.

4d: Wrap Fee Program

The Advisor does not sponsor a wrap fee program.

4e: Assets under Management (AUM)

EWWM, as of December 31, 2011, has \$203,874,791.00 in discretionary reportable Assets under Management and \$131,294,546.00 in non-discretionary reportable Assets under Management for a total of \$335,169,337.00.

ITEM 5 – FEES AND COMPENSATION

5a: Tiered Fee Schedule

Equity and Balanced Accounts Fee Schedule:

1% on assets under \$5,000,000
Fees on assets in excess of \$5,000,000 are negotiable

Fixed Income Only Fee Schedule:

.5% up to 5,000,000
Fees on assets in excess of \$5,000,000 are negotiable

ETF Asset Allocator Only Fee Schedule:

Fees on all assets are .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 EWW, 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

EWW does not have an account minimum. However, we may decline to accept clients with smaller portfolios.

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

5b: Selection of Other Advisors' Fees

EWW does not select other advisors.

5c: Fee Payment Options

Investment Management Fees

EWWM fees are paid from your account by the custodian when we submit an invoice to them. The invoice we submit shows the amount of fees, 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. In addition to our fees, there may be custodial, mutual fund or similar third party management fees and charges.

EWWM 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 Wealth Management 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.

5.c.1: Termination

Either EWWM or our clients can terminate our agreement upon receipt of written notice to the other party.

When an agreement is terminated, we will refund any pre-paid, unearned wealth management fees based on the number of days remaining in the quarter after termination. Refunds will be made within 30 calendar days of the effective date of termination.

When an agreement is terminated, all assets may need to be transferred from the current custodian. You will be responsible for paying all fees including full quarterly custodial administrative fees, account closure fees, mutual fund fees and all trading costs due to the termination. Custodian may assess additional fees for transfer of illiquid investments. If there is insufficient cash in the account, the liquidation of some securities may be used to pay the fees. Prior to termination of an agreement, we can provide a good-faith estimate of these fees.

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 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

EWWM does not charge advisory fees on the performance of funds or securities in your account.

ITEM 7 – TYPES OF CLIENTS

EWWM generally provides asset management and financial planning services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans
- Charitable Organizations

ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

8a: Analysis

EWWM uses 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

At East West Wealth Management, 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 independent, fee only, privately held company wholly owned by its employees, 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
- Business Owners: Sale, M&A, Stock Sales/Liquidity, Capital Market Options
- Foundations/Non-Profits: Consultant Selection, Multi-Manager Coordination

Multi-Family Office Services – Turn-key Family Office Solutions

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” not “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.

EWWM 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 EWWM 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

EWWM does 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 EWWM nor our employees hold any of the above registrations.

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

Neither EWWM nor our 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

EWWM does not select other advisors.

ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

11a: Code of Ethics Description

EWWM has adopted the Code of Ethics for Certified Financial Analysts, which is considered the highest possible professional standard. A copy of the code can be found at <http://www.cfp.net/learn/codeofethics.asp>. EWWM has adopted a Code of Ethics that governs a number of potential conflicts of interest we have when providing our advisory services to you. This Code of Ethics is designed to ensure 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

EWWM, 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 EWWM, 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.

EWWM will always maintain full disclosure with our clients so that you can make informed decisions. We will always 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

As part of our services, EWWM will recommend a broker-dealer. We have selected our broker-dealers based on price, reliability, speed of processing, tools and “best execution” in addition to other considerations. And while you are not required to effect transactions through any broker-dealer recommended by us, we feel we have made our selections based on a totality of benefits they offer.

To avoid creating a possible conflict of interest in recommending broker-dealers, we have established the following restrictions in order to ensure its fiduciary responsibilities:

1. EWWM adheres to our Code of Ethics as outlined in Item 11 above.
2. If EWWM receives separate compensation for transactions, we will fully disclose them.
3. EWWM emphasizes the unrestricted right of you to select and choose your own broker or dealer.
4. EWWM will always act in accordance with all applicable federal and state regulations governing registered investment advisory practices.

ITEM 13 – REVIEW OF ACCOUNTS

13a: Periodic Reviews

Accounts are reviewed by Gregory E. Ratte, CFA® or qualified staff members. All reviews are either conducted or supervised by Gregory E. Ratte, CFA®. 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 are triggered by a change in your investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; or, changes in economic climate.

13c: Regular Reports

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

EWWM may purchase software, tools, training programs or seminar services from our broker-dealer. Additionally, broker-dealers may provide services, tools or other 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 by influencing our choice of a broker-dealer.

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

EWWM does not directly or indirectly compensate any person for client referrals

ITEM 15 – CUSTODY

EWWM clients' accounts are held by a qualified custodian. Except to withdraw fees, EWWM does 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

EWWM is 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 will be sent, in conformity with applicable law, to you.

EWWM generally want our clients to give us discretionary authority to execute transactions without our client's prior approval. These transactions may include the purchase and selling of securities, arranging for payments or generally acting on behalf of our clients in most matters necessary to the handling of the account.

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 (I.E., PROXY VOTING)

Unless specifically directed otherwise in writing by you, EWWM does 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

EWWM has no financial issues that could impair our ability to carry out our fiduciary duty to our clients. Advisor has not been the subject of a bankruptcy petition in the last ten (10) years.

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

ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

EWWM is registered with the SEC and only notice files with state regulators.