

Item 1 – Cover Page

Ro&Lambert Inc

Asset Management & Securities

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Jan. 2011

This Brochure provides information about the qualifications and business practices of Ro&Lambert, “Registrant”. If you have any questions about the contents of this Brochure, please contact us at the above contract. 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.

Ro & Lambert is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Ro&Lambert also is available on the SEC’s website.

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Item 2 – Material Changes

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 Jan. 2011 is a new document prepared according to the SEC’s new requirements and rules. Even though the information contained is not materially changed as the previous documents filed, this Document is materially different in structure and format 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.

Item 4 – Advisory Business Item 5– Fees and Compensation

Ro&Lambert, inc (“Registrant”) as a total asset management and investment advisory firm, manages investment advisory accounts both for individuals and institutions on a discretionary basis and provide any investment related consulting and advisory services.

Clients’ Account Agreement may be canceled at any time, by either party, for any reason upon written notice. Typically, a refund of prepaid fee is not applicable. The account agreement shall have 3 business days to terminate the registrant’s service without any penalty.

Upon the termination of services, the registrant doesn’t have any obligation to the advice on portfolio holdings as well as the gains or losses and typically whole portfolio will be liquidated.

However, in the case of clients’ notification of ending the registrant’s service within a 3 years of its service inception, the termination fee shall be applied into exit to encourage the clients’ aptitude for the long term horizontal rather than the short term horizontal objective achievement period. The termination fee, which is corresponding to the 1 year’s advisory/management fees, may be negotiable based on the registrant’s sole discretion.

The only publication related to the investment management services is the quarterly newsletter sent to the existing clients and other would-be parties, which is intended to inform of the general investment ideas, the specific investment, and the current economic trends. More frequent newsletters may be served based on any other charged demand or circumstances.

The registrant occasionally provides the financial planning services whose subjects include development of income and net worth statements, estate analysis, tax-efficient investment analysis. The registrant may provide those services and generate occasional estate and financial planning ideas to be reviewed and implemented by the qualified and independent estate attorneys and tax practitioners.

Item 5– Fees and Compensation

The Registrant’s Standard Fee Schedule or the institution and individuals is as following:

*Asset under Management Between \$250,000 and \$500,000 : 2.5% per year

*Asset under Management Above \$500,000 : 2% per year

*Asset under Management Above 1 Million : 1.5% per year

Fees are typically charged quarterly in arrears based on the market value of assets in advance.

Ro&Lambert believes that its fees are competitive with those fees charged by other investment advisor/fund management for comparable services; however, clients may find any other comparable services with lower structure of fees available from other sources.

In certain circumstances, fees and minimums may be negotiable. To the extent that fees are negotiable, some clients may pay more or less than other clients, depending, for example, on the account duration, number of related accounts, and the characteristics of assets and services provided. With specific client authorization, the registrant may automatically deduct advisory/management fees.

The registrant generally requires a minimum quarterly fee of \$1,250.00 for an asset management services. Various related client account may also be grouped together for the clients' reduced advisory fees. The registrant also, in its sole discretion, may reduce its minimum fee based on an anticipated future earnings and/or asset capacity.

In the case of clients' notification of ending the registrant's service within a 3 years of its service inception, the termination fee shall be applied into exit to encourage the clients' aptitude for the long term horizontal rather than the short term horizontal objective achievement period. The termination fee, which is corresponding to the 1 year's advisory/management fees, may be negotiable based on the registrant's sole discretion.

The fees charged associated with financial planning services is an one time fee. The fees can vary depending upon the complexities of the client's financial situation. Fees may be partially payable in advance with the balance payable upon the delivery of the plan. Clients may also have an option for the method of being charged on hourly basis for various researches and analysis. In that case, the registrant's common hourly charge is \$300 per hour if the registrant decides to do so with the consensus of client.

The registrant's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment and other third parties.

Such charges, fees and commissions are exclusive of and in addition to advisory fee, and the registrant may or may not receive any portion of these commissions, fees, and costs.

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

In some cases, the registrant has entered into performance fee arrangements with qualified clients: such fees are subject to individualized negotiation with each such client.

This category of advisory fee is based on performance as well as assets under management for accredited investors and/or qualified purchasers. Performance fees generally do not exceed 35% of the capital appreciations and/or capital gains per year. However, in the case of exceptional returns either that incentive fees are based on the total returns and/or capital appreciation above the benchmark return such as Dow Jones/S&P 500 or absolute terms, the incentive fee can go up to 50% from those gains and/or appreciation. Investors should meet the qualification for the performance fee structure in line with the 1933 Act/ CCR Section 260.234. For both accredited investors and non-accredited investors, the annual management fee remains the same.

Item 7 – Types of Clients

Ro&Lambert provides portfolio management services and any investment related consulting services to individuals, high net worth individuals, corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, endowments, municipalities, registered mutual funds, private investment funds, trust programs, sovereign funds, foreign funds such as UCITs and SICAVs, and other U.S. and international institutions. The registrant generally requires that client with a minimum investment of \$250,000. But the registrant reserves the right to accept clients account that do not meet minimum condition.

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

Ro&Lambert employs both traditional and fundamental security analysis with a valuation discipline in equity selection approach as well as momentum strategy where the fundamental analysis is far less weighted, combined with long and short position. We research our own investment ideas as well as relying on various external research services and wall street brokerage firms. Our annual equity portfolio turnover rate averages about 30% or more.

On the part of equity portfolio strategy for the traditional and fundamental analysis, our approach doesn't solely depend on the fundamental analysis. However, we are in general position to consider an equity, selling at below-average P/E ratios and above-average dividend yield. We favor companies with long-term records of earnings and dividend growth, strong balance sheets, above-average probability levels, and global business franchises.

The equity portfolio, in general, may be consisted of 3-20 concentrated position. This approach allows us to focus on our best investment ideas and maximize investment returns while still maintaining appropriate minimum levels of diversification. Some of the clients may view this portfolio structure as non-diversified portfolio. Even though the registrant has full discretion over

the portfolio holdings and timing of purchase and sales with a flexible portfolio structure, in the case that clients prefer the certain level of diversification structure, the written notice of clients at each annual renewal can be conveyed to direct the constraint of the minimum number of concentrated position.

On the part of bond portfolio, we use semi-passive approach with tax-efficient structure. Bond portfolio can be diversified with funds.

Our clients may benefit from customized and segregated investment accounts. This results in each client having their own portfolio securities. While registrant principally invests in long and short positions in equity and real asset, the registrant may periodically invest in S&P 500 Index future and any other commodity contracts as well as various option contracts to gain exposure to the market movement.

All clients should be aware that investment product is variable by nature and therefore is not guaranteed to produce any certain output by inherent nature. And in addition, the short positions as well as other future strategy may incur the investment loss substantially beyond the accounting holdings by regulation. Investing in securities involves risk of loss that clients should be prepared to bear. However, all clients have privilege to request the constraint appropriate to the structure of trust or account with a written policy at the beginning of each annual inception renewal term.

Item 8 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any disciplinary events that would be material to your evaluation of Ro&Lambert or the integrity of Ro&Lambert's management. The registrant has no disciplinary action applicable to this Item.

Item 9 – Other Financial Industry Activities and Affiliations

Ro&Lambert is not associated with other financial industry activities. However, the principal is registered with the Broker Dealer. The advisory service and broker-dealer service is the separate entity.

Item 11- Code of Ethics

Rule 204A-1 under the Investment Advisers Act of 1940 ("Advisers Act") requires all registered investment advisor to adopt codes of ethics that set forth standards of conduct and require compliance with federal securities laws. The code of ethics is intended to reflect fiduciary principles that govern the conduct of Ro&Lambert. It consists of an outline of policies regarding several key areas: standard of conduct and compliance with laws, rules and regulation, protection of material non-public information and personal securities trading. The registrant will foster a culture of openness and honesty among its employees and reinforce the importance that act in the best interests of the client.

Protection of Material Non Public Information

Supervised persons are reminded that they must review the confidentiality of information on the prevention of misuse of material non public information. All persons are obligated to hold all client personal and business information in strict confidence.

Securities Trading

The registrant, from time to time, may purchase or sell securities for its own accounts. The securities may at the same time be recommended to clients. However, clients' interest will be honored first in a manner that the positions for the own account is maintained to ascertain that initial position held by clients are not materially influenced by the registrant position.

In addition, the code of ethics is designed to assure that the personal securities transactions, activities and interests of the employees of the registrant 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.

Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between the registrant and its clients.

The code also include the provisions that advisers access the client information on a 'need to know' basis while protecting the clients' privacy. The code of ethics also prohibits the supervised person to implement the front running trade, meaning the supervised person knowingly benefit from buying the position that is expected to make the transaction for the clients' account if it will, with a reasonable basis, materially affect the market movement. The criteria for that guidelines is within 3 days when the supervised person knows at the time of purchase that the security is being purchased within 3 days for the clients' account.

However, the supervised persons' trade before the client, which deems to be considered to take the extra risk while reducing the clients' risk orientation for the purpose of clients' risk tolerance profile may be allowed in some cases where the risk profile is changed from time to time.

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 the registrant's clients.

It is the registrant's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. The registrant will also not cross trades between client accounts. However, in order to qualify as principal or agency cross securities transactions, those trade has to prearrange to benefit some party while putting a disadvantage to the other party.

Recordkeeping

Rule 204-2(a) (12) and (13) of the advisers act requires advisors to keep copies of all relevant material relating to the Advisor Code. The supervised persons with a copy of this code of ethics and any amendments are required to provide with a written acknowledgment of their receipt of the code and any amendments. Each supervised person's recordkeeping must be reported and reviewed at least once a year.

Item 12 – Brokerage Practices

The registrant will be functioning on the discretionary basis with a limited power of attorney. Please see the disclosure at Item at 4. In this process, clients may arrange for the execution of securities transactions for the account through brokers or dealers. In selecting a broker or dealer, the registrant may consider, among other things, the broker dealer execution capacities, reputation and access to the markets. The registrant generally will seek competitive commission rates but will not necessarily attempt to obtain the best possible commission for transactions for the account because each brokerage account differs in the fee structure. However, for clients' convenience, the registrant may list various broker dealer such as Morgan Stanley, Fidelity, SunAmerica Financial Group or others as an officially affiliated broker dealer.

The registrant, from time to time, may purchase or sell securities for its own accounts. The securities may at the same time be recommended to clients. However, clients' interest will be honored first in a manner that the positions for the own account is maintained to ascertain that initial position held by clients are not materially influenced by the registrant position.

Item 13 – Review of Accounts

For those clients to whom registrant provides investment supervisory services, account reviews are conducted on an regular basis by the registrant's principals and/or associated persons. All investment supervisory clients are advised that it remains their responsibility to advise and notice the registrant of any changes in their investment objectives and financial situations. All clients (in person or via telephone) are encouraged to review investment objectives and account performance with the registrant on an annual basis.

Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer / custodian and/or program sponsor for the client accounts. Those clients to whom registrant provide investment supervisory services may also receive a supplemental quarterly report from the registrant summarizing quarterly letter.

Item 14 – Client Referrals and Other Compensation

The firm does not currently have any compensation for client referral agreements.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. But most of broker-dealer provides the monthly statements. Ro&Lambert urges you to carefully review such statements and compare such official custodial records

Item 16 – Investment Discretion

The registrant usually 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. In all cases, however, the client has the option not to use the discretionary authority or create the investment restraint such as the amount of portfolio holdings required by the clients. Investment guidelines and restrictions must be provided the advisor in writing.

Item 17 – Voting Client Securities

As a matter of firm practice, Ro&Lambert does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. The registrant may provide advice to clients regarding the clients' voting of proxies.

Item 18 – Financial Information

Registered investment advisers are required in this item to provide you with certain financial information or disclosure about the registrant's financial condition such as the balance sheet if the registrant requires the prepayment of more than \$1,200 in fees per client in advance. However, it is the firm's policy not to require the prepayment unless the clients receive the supervisory services at the end of each quarter.

Item 19 – Requirements for State-Registered Advisers

Ro&Lambert's professionals in rendering and determining investment needs to fulfill general college education and at last 3 years industry experience preferably from the major reputable financial institutions. Completion of or work toward chartered financial analyst designation is desired. Occasionally, registrant will train the individuals whom the registrant on its discretion believes to be talented or has shown some track record to be qualified.

Alex C. Ro is the chief investment fund management officer. Mr. Ro started his financial and asset management career since 2000. In Feb. 2000, he obtained the NASD's General Security License Series 7 and had worked at the investment division of the accounting firm, H&R Block. From 2003 to 2006, Mr. Ro moved on his industry career at the Morgan Stanley Global Asset Management, specialized in the portfolio hedging prior to establishing the independent research oriented asset management firm, Ro & Lambert.

Mr. Ro has gained the various financial licenses and education. Mr. Ro majored in economics at the University of London, London School of Economics at United Kingdom. He also completed the financial engineering course works of certification such as 'forecasting financial market' at the University of London. Mr. Ro is also scheduled to complete his diploma of urban and Land

Economics at the University of British Columbia, Sauder School of Business by the end of 2011 while he is working.

Mr. Ro's prior registered NASD license includes FINRA Series 7 General Security (stock, bonds, options), Series 65/66 (registered investment advisor and uniform security law). He also obtained the National Future Association's license, Series 31 (future management fund), Series 3 (national commodity futures; commodity, oil, gold, and other interest/index futures).

Mr. Ro, born, in 1973, at Seoul, South Korea, moved into US at the age of 18 and has established his residency at California more than 10 years. During that period, he also worked as a journalist and became the member of National Honor Society at College.