



## Firm Brochure

### **CONCERT Capital Management, Inc.**

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This brochure provides information about the qualifications and business practices of CONCERT Capital Management, Inc. If you have any questions about the contents of this brochure you are encouraged to contact us by mail, phone, or email:

**Mail: CONCERT Capital Management, Inc.  
1900 The Alameda, Suite 300  
San Jose, California 95126**

**Phone: 408.856.6223**

**Email: [compliance@concertglobal.com](mailto:compliance@concertglobal.com)**

Information about our firm may be also be found on the SEC website, <http://www.adviserinfo.sec.gov> and use the "Investment Adviser Search" tool to search by Investment Adviser Firm. The search may be conducted by Firm name, CONCERT Capital Management, Inc.; IARD/CRD Number 158763, or SEC Number:801-72666 . The SEC website also provides information about affiliated persons who are registered as an Investment Advisor Representative (IAR) of CONCERT Capital Management, Inc.

Information on our investment advisor representatives who work on your behalf can be found in our brochure supplement, Part 2B.

*The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the "SEC") or by any state securities authority. Registration does not imply a certain level of skill or training.*

## **Material Changes**

The following are “Material Changes” since the last revision of our brochure:

Our new address, as of September 1<sup>st</sup>, 2012 is:

1900 The Alameda  
Suite 300  
San Jose, CA 95126

All other contact information remains the same.

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## **Advisory Business**

CONCERT Capital Management, Inc., is a wholly owned subsidiary of CONCERT Global Group Ltd., which was formed and registered in the State of California in March 2006. CONCERT Capital Management, Inc. has been registered with the United States Securities and Exchange Commission since August 2011. Principal owners of CONCERT Global Group Ltd. include Felipe and Elizabeth Luna through their trust.

We provide sub-advisory services as a third party money manager. Factors considered in the selection of a third party manager include, but may not be limited to an advisor's preference for a particular third party manager, client risk tolerance, goals, and objectives, as well as investment experience, and the amount of assets available for investment.

As a sub-advisor we work closely with your primary advisor to ascertain how to best tailor our services to the individual clients' needs. Clients may have restricted stock, or, as a result of their position, have restrictions imposed on their securities trading. Clients may also express personal objections to particular types or groups of companies. Restrictions and/or objections should be communicated to, and noted by the primary advisor.

Currently we manage approximately \$6,000,000 in discretionary assets.

## **Fees and Compensation**

Our money management services are compensated by your primary advisor.

## **Other Fees Incurred**

As your Investment Advisor is compensated for services provided, so too are others for providing ancillary services to the client's account. The Custodian, Broker-Dealer, and Mutual Fund Manager, among others, are compensated by fees including, but not limited to account custody, service, margin interest, taxes, transactions and trade commissions. Not all of these fees are related to all clients. Some fees are detailed in the client statement, others, such as trade commissions and transaction fees, become part of the cost of the trade. Fees for custodial, and broker-dealer services will be listed in their contract. Fees for Mutual Funds will be detailed in the funds' prospectus.

## **Reimbursement**

When our services on your account(s) are terminated, your primary advisor may be reimbursed for any prepaid period remaining in the quarter after our service was terminated.

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

We have no provision for Performance-Based Fees, or Side-By-Side Management.

## **Types of Clients**

Our clients may include financial advisors, individuals and family groups, institutions, trust and estates, pension and profit sharing plans funds, corporations and charitable organizations. There is a \$30,000 minimum account size.

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

### **Methods of Analysis**

We make use of a range of Fundamental and Technical analysis methods in providing investment advice and guiding asset management.

Fundamental analysis is a method used to examine the prospects of a particular security with respect to its industry and the overall economy by analyzing financial statements, management, competitors, and markets. This information is used to determine a company's intrinsic value. When compared to the market value of the company, the intrinsic value shows whether the security is overpriced or underpriced, giving advisors an indication of when to buy or sell. Fundamental analysis is applied not only to specific securities, but to all assets. The same principle described can be used with securities, sectors, indexes, and countries on a macro-level. Risk is inherent, as fundamental analysis does not predict future market movements or price fluctuations.

Technical analysis is a method of attempting to predict market trends using charts, indices, and other tools. By analyzing a security's historical price fluctuations and patterns, an attempt is made to predict future price movements. Technical analysis does not take into account a company's management and underlying financial condition. As with fundamental analysis, technical analysis can be applied to the full range of asset classes. Risk is inherent, as historical trends in no way are guaranteed to accurately predict future price behavior.

Additional potential risks include financial or interest rate fluctuation, liquidity, exchange rates, and country or political risks. Unforeseen issues with company management, natural disasters, political shifts, and other unsuspected events are among the many forces that can change the direction of a company, an industry or the whole market. Although portfolios are managed in line with client risk tolerances, there is no guarantee of success, and investment loss is a possibility.

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

## **Investment Strategies**

Asset allocation is a crucial part of our investment strategy. Using a combination of equities, fixed income, and cash, an appropriate ratio is determined to a client's unique investment goals and risk tolerance. This strategy falls in line with the principles of Modern Portfolio Theory, with the fundamental concept holding that a portfolio should be made up of assets based on how the price changes relative to the rest of the portfolio, as opposed to on the merits of the asset itself. While individual stocks can play a part in the construction of a portfolio, ETFs and Mutual Funds comprise the bulk of assets. A risk of asset allocation is that the client might not participate in sharp increases in a particular security, industry, or market sector. Another risk is that the ratio of equities, fixed income, and cash will change as the market moves; if the allocation is not corrected, it will cease to represent the client's original goals.

Margin transactions involve using money borrowed from the client's brokerage account to purchase securities, allowing the client to make additional purchases without selling other holdings. Investing on margin presents substantial risk, as it exposes clients to a loss greater than the original amount invested.

Value investing involves buying securities that have been determined by us to be significantly underpriced relative to their intrinsic value. Using fundamental analysis, we attempt to identify these undervalued stocks to generate returns. As with any security, risk is present in that past performance by no means guarantees future results.

Options trading strategies include covered calls, puts and shorts. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset at a specific price on or before a set date. We may use options in a variety of ways, including as part of specific income strategies and as a hedge to limit potential downside when a sharp price change occurs. A covered call is the sale of a call option (right to buy) for a fee. In exchange for an up-front fee, the owner of a stock gives the purchaser of a call option the right to buy the stock at a predetermined price by the expiration date. Covered calls, while they guarantee returns via the fees paid, present the risk of losing out on capital gains. Options present the risk of losing value, and if not exercised, represent a loss of the amount they cost to buy.

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## **Disciplinary Information**

There are no material disciplinary disclosures for the Firm.

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

CONCERT Capital Management, Inc. is a subsidiary of CONCERT Global Group Ltd. ("CONCERT Global"). CONCERT Global is also the parent company of CONCERT Wealth Management, Inc. and Private Client Advisors, Ltd. which are both registered investment advisor firms. Other affiliations under CONCERT Global include CONCERT Advisor Services, which assists in transitioning advisors from a broker-dealer sponsored platform to an independent investment advisor model; CONCERT Business Consulting, which offers support to managers/owners in various areas of business; and AdvisorView, a proprietary software product.

Any compensation earned by our affiliates will be separate of CONCERT Capital Management, however a conflict of interest exists where there is an incentive to refer clients to an affiliate.

## **Custodial Benefit Agreement Disclosure**

Schwab Advisor Services has provided economic assistance to our affiliate, CONCERT Wealth Management, Inc., by terms of an agreement between Charles Schwab & Co., Inc.'s Advisor Services division and CONCERT Wealth Management, Inc. to assist in the transfer of account exit fees incurred by clients' accounts, and to use towards consulting and implementation fees associated with the onboarding of CONCERT's independent investment advisor representatives.

A conflict of interest exists wherein such benefit would influence the decision of the Firm to choose Schwab to maintain custody of clients' assets and to effect trades for their accounts. The Firm and Schwab Advisor Services are separate, unaffiliated entities. Schwab Advisor Services provides the Firm with access to institutional trading and operational services typically not available to Schwab's retail customers. These services are generally available to independent investment advisers at no charge to them as long as a total of at least \$10 million of the advisor's clients' account assets are maintained at Schwab Advisor Services. Schwab Advisor Services also makes available software and other technology to provide access to client account data, facilitate trade execution, or market research data.

Most custodians provide technology to interact with client and market data. It is disclosed here because a conflict of interest exists where the Firm, or an affiliate, receives economic assistance that may influence the decision to suggest Schwab's custodial services.

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

We have adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the adviser. In addition, the Code of Ethics governs personal trading of each employee deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of the adviser are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates. We may from time to time purchase or sell products that we may recommend to clients. We collect and maintain records of securities holdings and securities transactions effected by Access Persons which are reviewed to identify and resolve potential conflicts of interest. Our Code of Ethics is available upon request.

## **Brokerage Practices**

We place trades for your account(s) subject to our duty of best execution and other fiduciary duties. We may use other broker-dealers to execute trades for client accounts maintained at the particular custodian, but this practice may result in additional costs to clients so that we are more likely to place trades through the custodian rather than other broker-dealers. Custodians generally do not charge for custody, but are compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through the custodian, or that settle into the custodial accounts.

## **Review of Accounts**

We review accounts on a weekly basis. Accounts are rebalanced as necessary to target allocation.

## **Client Referrals and Other Compensation**

We are not affiliated with any custodian or broker-dealer, but custodians may provide access to its institutional trading and custody services, which are typically not available to retail investors. For example, brokerage services may include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Custodians generally do not charge separately for custody services but are compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through the custodian or that settle into the custodians' accounts.

## **Custody**

We do not take physical custody of your account's assets. We require that your assets be placed with a qualified custodian. Your custodian will be responsible for providing you with statements at least quarterly, and some custodians provide statements more frequently than quarterly. You should carefully review the statements you receive from your custodian for accuracy. If your primary advisor also provides statements, please consider comparing the custodial statement and statements received by your primary advisor for accuracy.

## **Investment Discretion**

We enter into discretionary investor advisory agreements that outline our responsibilities. When we have discretion over your account we determine what securities are bought and sold, the amount of the purchases and sales, the brokers through which the transactions are executed, and the commission rates, if any, that are paid for the transactions.

## **Voting Client Securities**

We do not vote proxies on behalf of clients. The client assumes the authority for the voting of proxies for securities held in accounts with the following exceptions: 1) Where accounts are subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. 2) Client's advisor assumes proxy voting responsibility.

In either case it should be indicated in the contract how the client may obtain a copy of the proxy voting policies and procedures of that particular fiduciary. Proxy voting materials received by us will either be forwarded to the client, or we will request the sender to redeliver, or confirm client receipt as applicable.

## **Financial Information**

We have no financial commitments that impair our ability to meet contractual and fiduciary commitments.