

**ITEM 1: Cover Page for
PART 2B OF FORM ADV:
BROCHURE SUPPLEMENT
DATED FEBRUARY 28, 2012**

RAVI MALHOTRA

**OAK & REED CAPITAL MANAGEMENT, LLC (“O&R”)
122 ASHLAND PLACE, #16J
BROOKLYN, NY 11201
(917) 520-3482**

FIRM CONTACT: RAVI MALHOTRA, CHIEF COMPLIANCE OFFICER

This brochure supplement provides information about Ravi Malhotra that supplements our brochure. You should have received a copy of that brochure. Please contact Ravi Malhotra, Chief Compliance Officer, if you did not receive our firm’s brochure or if you have any questions about the contents of this supplement.

Additional information about Ravi Malhotra is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

We are required to disclose the following information about Ravi Malhotra:

Name: Ravi Malhotra

Year of Birth: 1974

Formal Education after high school:

- 1996; Stony Brook University; B.S. Business Management and Economics
- Presently enrolled in M.A. program at New York University in Applied Economics

Business Background (for the past 5 years):

- 12/2011 – Present, Oak & Reed Capital Management, LLC-Managing Member & Chief Compliance Officer
- 03/2005 – 12/2011, Merrill Lynch, Pierce, Fenner & Smith Incorporated- Wealth Management Advisor & Portfolio Manager, PIA Program

CRPC - Chartered Retirement Planning Counselor :

Mr. Malhotra has a professional designation, Chartered Retirement Planning Counselor (CRPC) since 2009. The CRPC is offered by The College for Financial Planning®. The CRPC Program focuses on the pre- and post-retirement needs of individuals, allowing students to transform the retirement planning process into a positive experience. The College for Financial Planning® awards the Chartered Retirement Planning CounselorSM and CRPC® designation to students who:

- successfully complete the program;
- pass the final examination; and
- comply with the Code of Ethics.

The following topics were covered under the program:

- The Retirement Planning Process & Meeting Multiple Financial Objectives
- Sources of Retirement Income
- Personal Savings: Investing for Retirement
- Employer-Sponsored Plans
- Individual Deferred Compensation
- Planning for Incapacity, Disability & Long-Term Care
- When to Retire
- Retirement Plan Distributions
- Asset Management & Investment Strategy During Retirement
- Income Taxes & the Retiree
- Estate Planning

CFM - Certified Financial Manager:

Mr. Malhotra became certified as a Certified Financial Manager in 2005. The CFM exams were discontinued December 31, 2007. The Institute of Management Accountants, Inc (“IMA”), continues to support all CFM holders with appropriate member services, recognition of the CFM achievement, and the maintenance of certification records.

The requirements for certification included passing four examinations testing economics, management, corporate finance, management accounting, decision analysis, and ethics. In addition, the candidate was required to complete two years of relevant work experience, hold a Bachelor’s degree, be a member of IMA, and abide by the Statement of Ethical Professional Practice. Once certified, a CFM is required to maintain membership in IMA and complete 30 hours of continuing education annually.

Item 3 Disciplinary Information

If there are legal or disciplinary events material to your evaluation of Ravi Malhotra, we are required to disclose all material facts regarding those events.¹

We have nothing to disclose in this regard.

Item 4 Other Business Activities

A. If Ravi Malhotra is actively engaged in any investment-related business or occupation, including if Ravi Malhotra is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated person of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

1. If a relationship between the advisory business and Ravi Malhotra’s other financial industry activities creates a material conflict of interest with you, the SEC requires us to describe the nature of the conflict and generally how we address it.

We have nothing to disclose in this regard.

2. If Ravi Malhotra receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual

¹ **Note:** Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Mr. Malhotra to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Mr. Malhotra to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

funds, we have to disclose this fact. If this compensation is not cash, we are required to explain what type of compensation Ravi Malhotra receives. We must explain that this practice gives Ravi Malhotra an incentive to recommend investment products based on the compensation received, rather than on your needs.

We have nothing to disclose in this regard.

- B. If Ravi Malhotra is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of Ravi Malhotra's income or involve a substantial amount of Ravi Malhotra's time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of Ravi Malhotra's time and income, we may presume that they are not substantial.

Ravi Malhotra is an insurance agent of various insurance companies. He may offer insurance products and receive normal and customary commissions as a result of insurance transactions. This presents a conflict of interest to the extent that Ravi Malhotra recommends that a client invest in an insurance product which results in a commission being paid to him.

A conflict of interest may arise as these commissionable insurance sales may create an incentive to recommend products based on the compensation adviser and/or our supervised persons may earn and may not necessarily be in the best interests of the client.

Item 5 Additional Compensation

If someone who is not a client provides an economic benefit to Ravi Malhotra for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include Ravi Malhotra's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

Item 6 Supervision

We are required to explain how we supervise Ravi Malhotra, including how we monitor the advice Ravi Malhotra provides to you. Our firm has to provide the name, title and telephone number of the person responsible for supervising Ravi Malhotra's advisory activities on behalf of our firm.

Ravi Malhotra is a principal and the Chief Compliance Officer and as such is bound by our firm's Code of Ethics. As Chief Compliance Officer, Mr. Malhotra is responsible for providing supervisory oversight to all employees of our firm.