

Corrales & Company LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Corrales & Company LLC. If you have any questions about the contents of this brochure, please contact us at (239) 421-5359 or by email at: mmoran@copecorrales.com. 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.

Additional information about Corrales & Company LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Corrales & Company LLC's CRD number is: 332189.

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Registration as an investment adviser does not imply a certain level of skill or training.

Version Date: 03/09/2026

Item 2: Material Changes

Corrales & Company LLC has the following material changes to report. Material changes relate to Corrales & Company LLC's policies, practices or conflicts of interest.

- The firm has updated its primary office address and phone number. (Cover Page)
- The firm has updated its Assets under Management. (Item 4.E)
- The firm has updated its Financial Industry Affiliations (Item 10.C)
- The firm has added Subscription Services to its services. (Item 4.B)
- The firm has added Educational Seminars/Workshops to its services. (Item 4.B)

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Item 4: Advisory Business

A. Description of the Advisory Firm

Corrales & Company LLC (hereinafter "Corrales & Co.") is a Limited Liability Company organized in the State of Florida. The firm was formed in June 2024, and the principal owner is Luis Alonso Corrales.

B. Types of Advisory Services

Portfolio Management Services

Corrales & Co. offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Corrales & Co. creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

Corrales & Co. evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Corrales & Co. will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

Corrales & Co. seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of Corrales & Co.'s economic, investment or other financial interests. To meet its fiduciary obligations, Corrales & Co. attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, Corrales & Co.'s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is Corrales & Co.'s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Corrales & Co. may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Before selecting other advisers for clients, Corrales & Co. will always ensure those other advisers are properly licensed or registered as an investment adviser. Corrales & Co. conducts due diligence on any third-party investment adviser,

which may involve one or more of the following: phone calls, meetings and review of the third-party adviser's performance and investment strategy. Corrales & Co. then makes investments with a third-party investment adviser by referring the client to the third-party adviser. These investments may be allocated either through the third-party adviser's fund or through a separately managed account managed by such third-party adviser on behalf of Corrales & Co.'s client. Corrales & Co. may also allocate among one or more private equity funds or private equity fund advisers. Corrales & Co. will review the ongoing performance of the third-party adviser as a portion of the client's portfolio.

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Subscription Services

Corrales & Co. provides subscription services for a fee. These services include a quarterly newsletter email blast that will include general information content to help individuals better understand relevant topics, industry updates, and best practices.

Educational Seminars/Workshops

Corrales & Co. provides free periodic educational seminars and workshops to clients and the general public. Educational seminars and workshops provide general informational content designed to help individuals and businesses better understand relevant topics, industry updates, and best practices. These sessions are offered to both clients and non-clients and are intended for educational purposes only. They do not provide personalized advice or recommendations.

Services Limited to Specific Types of Investments

Corrales & Co. generally limits its investment advice to mutual funds, fixed income securities, real estate funds, equities, hedge funds, private equity funds, ETFs (including ETFs in the gold and precious metal sectors), treasury inflation protected/inflation linked bonds and private placements. Corrales & Co. may use other securities as well to help diversify a portfolio when applicable.

Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We also have a fiduciary duty under the Investment Advisers Act of 1940 with respect to all client accounts. The

way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Disclose to you basic information about conflicts of interest.

C. Client Tailored Services and Client Imposed Restrictions

Corrales & Co. will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by Corrales & Co. on behalf of the client. Corrales & Co. may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees and transaction costs. Corrales & Co. does not participate in wrap fee programs.

E. Assets Under Management

Corrales & Co. has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$152,858,001	\$21,331,877	December 2025

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
\$1 - \$500,000	1.75%
\$500,001 - \$3,000,000	1.30%
\$3,000,001 - \$5,000,000	1.00%
\$5,000,001 - \$10,000,000	0.85%
\$10,000,001 - AND UP	0.75%

Corrales & Co. uses an average of the daily balance in the client's account throughout the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are generally negotiable and the final fee schedule will be memorialized in the client's advisory agreement. Clients may terminate the agreement without penalty for a full refund of Corrales & Co.'s fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Selection of Other Advisers Fees

Corrales & Co. may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Upon disclosure to Clients and the Clients' written acknowledgement and consent, Clients will pay Corrales & Co. its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between Corrales & Co. and each third-party adviser. The fees will not exceed any limit imposed by any regulatory agency.

Financial Planning Fees

Fixed Fees

The negotiated fixed rate for creating client financial plans is between \$99 and \$10,000.

Clients may terminate the agreement without penalty, for full refund of Corrales & Co.'s fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

Payment of Selection of Other Advisers Fees

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected.

Payment of Financial Planning Fees

Financial planning fees are paid via check, ACH, credit card and wire.

Fixed financial planning fees are paid in arrears upon completion.

C. Client Responsibility For Third-Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by Corrales & Co. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

Corrales & Co. collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Luis Alonso Corrales and Joseph Martin Landesman, in their outside business activities (see Item 10 below), are licensed to accept compensation for the sale of investment products to Corrales & Co. clients. This presents a conflict of interest and gives the supervised person an incentive to recommend products based on the compensation received rather than on the client's needs. When recommending the sale of securities or investment products for which the supervised persons receive compensation, Corrales & Co. will document the conflict of interest in the client file and inform the client of the conflict of interest. Clients always have the right to decide whether to purchase Corrales

& Co. -recommended products and, if purchasing, have the right to purchase those products through other brokers or agents that are not affiliated with Corrales & Co.

Commissions are not Corrales & Co.'s primary source of compensation for advisory services. Advisory fees that are charged to clients are not reduced to offset the commissions or markups on securities or investment products recommended to clients.

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

Corrales & Co. does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

Corrales & Co. generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for any of Corrales & Co.'s services.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Corrales & Co.'s methods of analysis include Charting analysis, Fundamental analysis, Modern portfolio theory, Quantitative analysis and Technical analysis.

Charting analysis involves the use of patterns in performance charts. Corrales & Co. uses this technique to search for patterns used to help predict favorable conditions for buying and/or selling a security.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various assets.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Technical analysis involves the analysis of past market data; primarily price and volume.

Investment Strategies

Corrales & Co. uses long term trading and margin transactions.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case as past performance does not guarantee future performance or results.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Quantitative analysis refers to investment strategies using quantitative models that may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Investment Strategies

Corrales & Co.'s use of margin transactions generally holds greater risk, and clients should be aware that there is a material risk of loss using any of those strategies.

Long-term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Margin transactions use leverage that is borrowed from a brokerage firm as collateral. When losses occur, the value of the margin account may fall below the brokerage firm's threshold thereby triggering a margin call. This may force the account holder to either allocate more funds to the account or sell assets on a shorter time frame than desired.

Selection of Other Advisers: Although Corrales & Co. will seek to select only money managers who will invest clients' assets with the highest level of integrity, Corrales & Co.'s selection process cannot ensure that money managers will perform as desired and Corrales & Co. will have no control over the day-to-day operations of any of its selected money managers. Corrales & Co. would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Corrales & Co.'s use of margin transactions generally holds greater risk of capital loss. Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance. Risks in investing in ETFs include trading risks, liquidity and shutdown risks, risks associated with a change in authorized participants and non-participation of authorized participants, risks that trading price differs from indicative net asset value (iNAV), or price fluctuation and disassociation from the index being tracked. With regard to trading risks, regular trading adds cost to your portfolio thus counteracting the low fees that one of the typical benefits of ETFs. Additionally, regular trading to beneficially “time the market” is difficult to achieve. Even paid fund managers struggle to do this every year, with the majority failing to beat the relevant indexes. With regard to liquidity and shutdown risks, not all ETFs have the same level of liquidity. Since ETFs are at least as liquid as their underlying assets, trading conditions are more accurately reflected in implied liquidity rather than the average daily volume of the ETF itself. Implied liquidity is a measure of what can potentially be traded in ETFs based on its underlying assets. ETFs are subject to market volatility and the risks of their underlying securities, which may include the risks associated with investing in smaller companies, foreign securities, commodities, and fixed income investments (as applicable). Foreign securities in particular are subject to interest rate, currency exchange rate, economic, and political risks, all of which are magnified in emerging markets. ETFs that target a small universe of securities, such as a specific region or market sector, are generally subject to greater market volatility, as well as to the specific risks associated with that sector, region, or other focus. ETFs that use derivatives, leverage, or complex investment strategies are subject to additional risks. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and

other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, or (3) a significant change in the attitude of speculators and investors. The return of an index ETF is usually different from that of the index it tracks because of fees, expenses, and tracking error. An ETF may trade at a premium or discount to its net asset value (NAV) (or indicative value in the case of exchange-traded notes). The degree of liquidity can vary significantly from one ETF to another and losses may be magnified if no liquid market exists for the ETF's shares when attempting to sell them. Each ETF has a unique risk profile, detailed in its prospectus, offering circular, or similar material, which should be considered carefully when making investment decisions.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; and the impact of present or future environmental legislation and compliance with environmental laws.

Hedge funds often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; may involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

Private equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

As a registered representative of GT Securities, Inc., Joseph Martin Landesman accepts compensation for the sale of securities.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Corrales & Co. nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Luis Alonso Corrales is a licensed insurance agent and owner of Corrales & Co. This activity creates a conflict of interest since there is an incentive to recommend insurance products based on commissions or other benefits received from the insurance company, rather than on the client's needs. Additionally, the offer and sale of insurance products by supervised persons of Corrales & Co. are not made in their capacity as a fiduciary, and products are limited to only those offered by certain insurance providers. Corrales & Co. addresses this conflict of interest by requiring its supervised persons to act in the best interest of the client at all times, including when acting as an insurance agent. Corrales & Co. periodically reviews recommendations by its supervised persons to assess whether they are based on an objective evaluation of each client's risk profile and investment objectives rather than on the receipt of any commissions or other benefits. Corrales & Co. will disclose in advance how it or its supervised persons are compensated and will disclose conflicts of interest involving any advice or service provided. At no time will there be "tying between business practices and/or services" (a condition where a client or prospective client would be required to accept one product or service conditioned upon the selection of a second, distinctive tied product or service). No client is ever under any

obligation to purchase any insurance product. Insurance products recommended by Corrales & Co.'s supervised persons may also be available from other providers on more favorable terms, and clients can purchase insurance products recommended through other unaffiliated insurance agencies.

Joseph Martin Landesman is a registered representative of GT Securities, Inc. and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as the offer of commissionable products conflict with the fiduciary duties of a registered investment adviser. Corrales & Co. is obligated to and will act in the best interest of the client, including with respect to the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Corrales & Co. in such individual's capacity as a registered representative.

Luis Alonso Corrales, as the sole owner of both Pine Tree Asset Management LLC (PTAM) and Corrales & Co, holds dual roles that could create potential conflicts of interest. These conflicts may arise from the possibility that Corrales & Co could recommend investments managed by PTAM to its advisory clients, benefitting PTAM and/or its affiliates. Strict internal controls have been implemented to manage these conflicts. As a result of the foregoing, PTAM's General Partner, its principal(s), and/or affiliate(s) (generally, affiliate means an entity or person who is directly or indirectly related to or connected with the Company, Sponsor, Manager, Manager Member or Member including, but not limited to, a relative, spouse, family member, or business partner) may have conflicts of interest in: (a) allocating their time and activity among the Partnership and other entities; (b) allocating investments among the Partnership and other entities; and (c) effecting transactions among the Partnership and other entities, including ones in which the General Partner, its principal(s), and/or affiliate(s) may have a greater financial interest; for example, due to the nature of PTAM's business or a personal or professional affiliation.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

Corrales & Co. may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Upon disclosure to Clients and the Clients' written acknowledgement and consent, Clients will pay Corrales & Co. its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between Corrales & Co. and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. Corrales & Co. is obligated to and will act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. Prior to any recommendation, Corrales & Co. will ensure that all recommended advisers are properly

licensed or notice filed in the states in which Corrales & Co. is recommending them to clients.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

Corrales & Co. has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Corrales & Co.'s Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Corrales & Co. does not recommend that clients buy or sell any security in which Corrales & Co. or a related person has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of Corrales & Co. may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of Corrales & Co. to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. Corrales & Co. will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of Corrales & Co. may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of Corrales & Co. to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, Corrales & Co. will not engage in trading that operates to the client's disadvantage if representatives of Corrales & Co. buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on Corrales & Co.'s duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and Corrales & Co. may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in Corrales & Co.'s research efforts. Corrales & Co. will not charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Corrales & Co. will require clients to acknowledge, consent to, and use Equity Trust Company, Schwab Institutional, a division of Charles Schwab & Co., Inc. and Fidelity Brokerage Services LLC.

1. Research and Other Soft-Dollar Benefits

While Corrales & Co. has no formal soft dollars program in which soft dollars are used to pay for third party services, Corrales & Co. may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). Corrales & Co. may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and Corrales & Co. does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. Corrales & Co. benefits by not having to produce or pay for the research, products or services, and Corrales & Co. will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that Corrales & Co.'s acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

Corrales & Co. receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

Corrales & Co. will require clients to acknowledge, consent to, and use a specific broker-dealer to execute transactions. Not all advisers require clients to use a particular broker-dealer.

B. Aggregating (Block) Trading for Multiple Client Accounts

If Corrales & Co. buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, Corrales & Co. would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients; provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. Corrales & Co. would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All client accounts for Corrales & Co.'s advisory services provided on an ongoing basis are reviewed at least quarterly by Luis Alonso Corrales, CEO, with regard to clients' respective investment policies and risk tolerance levels. All accounts at Corrales & Co. are assigned to this reviewer.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Luis Alonso Corrales, CEO. Financial planning clients are provided a one-time financial plan concerning their financial situation. After the presentation of the plan, there are no further reports. Clients may request additional plans or reports for a fee.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

With respect to financial plans, Corrales & Co.'s services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each client of Corrales & Co.'s advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian.

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Other than soft dollar benefits as described in Item 12 above, Corrales & Co. does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Corrales & Co.'s clients.

With respect to Schwab, Corrales & Co. receives access to Schwab's institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser's clients' assets are maintained in accounts at Schwab Advisor Services. Schwab's services include brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, 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. For Corrales & Co. client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to Corrales & Co. other products and services that benefit Corrales & Co. but may not benefit its clients' accounts. These benefits may include national, regional or Corrales & Co. specific educational events organized and/or sponsored by Schwab Advisor Services. Other potential benefits may include occasional business entertainment of personnel of Corrales & Co. by Schwab Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other products and services assist Corrales & Co. in managing and administering clients' accounts. For example, software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of Corrales & Co.'s fees

from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of Corrales & Co.'s accounts. Schwab Advisor Services also makes available to Corrales & Co. other services intended to help Corrales & Co. manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, human capital consultants, insurance and marketing. In addition, Schwab may make available, arrange and/or pay vendors for these types of services rendered to Corrales & Co. by independent third parties. Schwab Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to Corrales & Co. Corrales & Co. is independently owned and operated and not affiliated with Schwab.

B. Compensation to Non - Advisory Personnel for Client Referrals

Corrales & Co. may retain third parties to act as solicitors for Corrales & Co.'s investment management services. Compensation with respect to the foregoing will be fully disclosed to each client to the extent required by applicable law. Corrales & Co. will ensure each solicitor/promoter is properly exempt or registered in all appropriate jurisdictions. All such referral activities will be conducted in accordance with the Advisers Act, where applicable.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, Corrales & Co. will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

Corrales & Co. provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, Corrales & Co. generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, Corrales & Co.'s discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to Corrales & Co.).

Item 17: Voting Client Securities (Proxy Voting)

Corrales & Co. will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

Corrales & Co. neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Corrales & Co. nor its management has any financial condition that is likely to reasonably impair Corrales & Co.'s ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Corrales & Co. has not been the subject of a bankruptcy petition in the last ten years.