

Item 1 – Cover Page

PMK Capital Advisors, Inc.

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This Brochure provides information about the qualifications and business practices of PMK Capital Advisors, Inc. (“PMKC”). If you have any questions about the contents of this Brochure, please contact us at (561) 454-1770. 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.

PMK Capital Advisors, Inc. 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 PMK Capital Advisors, Inc. is also available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure dated March 2012 reflects our annual update of our brochure and does not contain any material changes over the March 2011 Brochure.

We will provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Wendy Wurst, Chief Compliance Officer at (561) 454-1770 or wwurst@pmksecurities.com.

Additional information about PMK Capital Advisors, Inc is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with PMKC who are registered, or are required to be registered, as investment adviser representatives of PMKC.

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Brochure Supplement(s)

Item 4 – Advisory Business

PMK Capital Advisors, Inc. (PMKC) is a registered investment adviser, doing business since 1999. PMKC is a wholly owned subsidiary of PMK Securities & Research, Inc. a registered broker-dealer owned by Roger Kumar and John Murphy. The primary focus of PMKC is providing investment advisory services to high net worth individuals.

PMKC currently offers the following investment advisory services:

PMKC offers a managed account program that may include, according to the client's needs, fixed income securities, equity securities, and options. This service is generally provided with discretion over the client's assets. The fee for this service varies and is negotiated on an individual client basis based on a number of factors such as the services being provided and the size of the account. Currently, fees are structured as follows:

- Flat Fee – clients are charged a flat fee per annum, charged quarterly in arrears
- Percent of assets under management billed quarterly in arrears
- Percent of assets under management billed quarterly in advance. If an advisory arrangement is terminated for any reason, clients will receive a pro-rata refund of any fees collected from the date of termination

The investment advice provided to clients in this program is tailored to the individual needs of the client or account. Clients may impose restrictions on the types of investments utilized in this program.

PMKC also provides consulting services to a foreign financial institution, relating to search and performance evaluation of U.S. based investment products. The foreign financial institution serves non-U.S. based institutional clients and maintains sole responsibility for investment recommendations to its clients. PMKC is compensated under this program based on a share of client fees charged by the foreign financial institution to those clients that invest in products PMKC introduces to the foreign financial institution. Fees paid typically represent 30% to 50% of the fees received by the foreign financial institution from its clients.

As of December 31, 2011, PMKC had total assets under management as follows:

Discretionary	\$ 121,771,448
Non-discretionary	\$ 0

Item 5 – Fees and Compensation

All fees are subject to negotiation.

Fees are currently structured as follows:

- Flat Fee – clients are charged a flat fee per annum, charged quarterly in arrears
- Percent of assets under management billed quarterly in arrears
- Percent of assets under management billed quarterly in advance. If an advisory arrangement is terminated for any reason, clients will receive a pro-rata refund of any fees collected from the date of termination

The specific manner in which fees are charged by PMKC is established in a client's written agreement with PMKC. PMKC will generally bill its fees on a quarterly basis. Clients may elect to be billed in advance or arrears each calendar quarter. Clients may also elect to be billed directly for fees or to authorize PMKC to directly debit fees from client accounts. Management fees may be prorated for significant capital contributions and withdrawals made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of an account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

Fees range from 0.10% per annum to 2.00% per annum. PMKC provides an invoice for management fees to clients whether fees are deducted or remitted.

PMKC'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 advisors and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in each fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to PMKC's fee, and PMKC may share in a portion of these commissions, fees and charges.

PMKC is an affiliate of PMK Securities & Research, Inc., a registered broker-dealer. Advisory representatives of PMKC may also be licensed agents of PMK Securities & Research. For those clients whose transactions are executed through PMK Securities & Research, Inc., the investment adviser representative and PMKS will share in the commission charged on those transactions. In addition, PMK Securities & Research, Inc. may charge a transaction fee for accounts held with its clearing firm and PMK Securities & Research, Inc. retains a portion this transaction fee. Client assets may be invested in mutual funds or exchange traded funds and the adviser, acting as broker, may receive compensation from the funds in addition to the fee charged by PMKC.

These factors may present a conflict of interest, as the advisor will receive additional compensation as broker for transactions executed through PMK Securities & Research, Inc. and may also receive additional compensation for investing in mutual funds, ETFs and other products.

Other brokerage firms may not charge the same fees as PMK Securities & Research and may offer commission rates that are higher or lower than those charged at PMK Securities & Research, Inc. PMKC's advisory clients may choose other brokers not affiliated with PMKC to provide execution, custodial and other account related services.

Item 12 further describes the factors that PMKC considers in selecting or recommending broker-dealers for *client* transactions and determining the reasonableness of their compensation (*e.g.*, commissions).

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

PMKC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

PMKC currently provides portfolio management services to individuals, high net worth individuals, charitable institutions and foundations, and to a foreign financial institution. We may also provide advisory services to corporate pension and profit-sharing plans, endowments, private investment funds, and trust programs.

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

PMKC's primary method of analysis is the use of fundamental data to evaluate suitable investments. This data may be provided by the issuer of the securities, third party research companies or other publicly available sources. As appropriate, other methods and information used to evaluate investments include yield analysis and technical analysis.

PMKC also utilizes comparative data to evaluate client account allocations versus appropriate market benchmarks.

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

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of PMKC or the integrity of PMKC's management. PMKC, its principals and affiliates have no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

PMK Capital Advisors is wholly owned by PMK Securities & Research, Inc., a registered broker-dealer. Principals, officers and associated persons of PMKC may hold securities licenses with PMK Securities & Research, Inc. and perform other investment related services to non-advisory clients. PMK Securities & Research is also a state registered investment advisor, offering primarily a non-discretionary fee program to its brokerage clients. The amount of time each person spends on each entity varies greatly depending on the primary function of the person. For Portfolio Managers, time is generally split between the two companies. PMKC's Chief Compliance Officer spends approximately 80% of time on work relating to PMK Securities & Research functions.

Securities transactions may be effected through PMK Securities & Research, Inc. Associated persons of PMK Capital will ensure that the commissions are fair, reasonable, and competitive, as compared with other brokerage services, however, commission rates may be found at other broker-dealers that are higher or lower than those charged at PMK Securities and Research, Inc. or other broker-dealers PMKC may suggest. It is the client's ultimate decision as to which broker-dealer will carry the account and effect any securities transactions.

Item 11 – Code of Ethics

PMKC has adopted a Code of Ethics for all supervised persons of the firm describing its standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and personal securities trading procedures, among other things. All supervised persons at PMKC must acknowledge the terms of the Code of Ethics annually, or as amended.

PMKC anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which PMKC has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which PMKC, its affiliates and/or clients, directly or indirectly, have a position of interest. PMKC's employees and persons associated with PMKC are required to follow PMKC's Code of Ethics to satisfy this policy and applicable laws. Officers, directors and employees of PMKC and its affiliates may trade for their

own accounts in securities which are recommended to and/or purchased for PMKC's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of PMKC 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. Because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between PMKC and its clients.

PMKC does not permit its employees to aggregate personal trades with client's trades in the same securities.

Clients or prospective clients may request a copy of the firm's Code of Ethics by contacting the firm's Chief Compliance Officer.

Item 12 – Brokerage Practices

PMKC typically seeks authority to determine the type and amount of securities to be bought and sold for clients. PMKC may also have discretion to select the broker to effect portfolio transactions for its managed accounts. PMKC will consider such factors as price, ability to effect transactions, commission rates, reliability and financial responsibility and products and services provided, when making decisions for client's accounts. Commission rates on transactions directed through PMK Securities & Research, Inc. are negotiated on an individual basis. Not all advisors recommend or require clients to allow those advisors to execute transactions through a specific broker-dealer.

Clients of PMKC that allow PMKC to direct transactions through PMK Securities & Research, Inc. may not always receive the most favorable execution of transactions and may pay more for certain transactions.

Generally, trades executed where PMKC has discretion over the broker are done at \$0.05 to \$0.08 per share or \$.005 to \$.02 per share, depending on the portfolio manager and account strategy. We believe these rates to be very competitive but may negotiate rates on a transactional basis based on the size of the trade or type of security.

Client trades may be aggregated together to obtain an average price for an execution of shares effected for multiple advisory accounts. Brokerage confirmations sent to clients by the executing broker will indicate if the transaction was executed as an average price. Clients may contact us or the executing broker to receive details of an average price execution.

Clients of PMK Capital that have transactions effected through PMK Securities & Research, Inc. may incur a \$10.00 "postage and handling" or "miscellaneous" fee on each transaction, in addition to

commissions. This fee is charged to clients to offset the costs associated with order handling, printing and mailing expenses. PMK's clearing firm retains a portion of the fee and rebates a portion of the fee to PMK Securities. Other broker/dealer may not charge this fee, or may charge a similar fee that is higher or lower than that of PMK Securities.

It is PMKC's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. PMKC will also not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. If a scenario arises where a cross transaction is beneficial to an advisory client, PMKC will seek the client's written authority prior to affecting the cross transaction for each such transaction.

Item 13 – Review of Accounts

Accounts which receive investment supervisory services will be reviewed regularly, often daily, by the Portfolio Manager. In addition, compliance personnel review accounts on a quarterly basis. Prior to opening the account, the client is interviewed in an attempt to identify the client's objectives, needs and suitability, as well as risk tolerance. Investments are selected in consideration of this information.

Clients receive the following quarterly reports from PMKC on their accounts:

- a) performance review
- b) portfolio appraisal

Item 14 – Client Referrals and Other Compensation

PMKC does not currently pay for client referrals.

Item 15 – Custody

Clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. PMKC urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

PMKC 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, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, PMKC observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to PMKC in writing.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, PMKC 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. PMKC 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 disclosures about PMKC's financial condition. PMKC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.