

DISCLOSURE BROCHURE

THE INVESTMENT ADVISERS ACT OF 1940 RULE 204-3

Part 2A of Form ADV: Firm Brochure



IARD/CRD #: 142093

Floyd Capital Management, LLC
REGISTERED INVESTMENT ADVISOR

Cover Page **ITEM 1**

This Disclosure Brochure provides information about the qualifications and business practices of Floyd Capital Management, LLC which should be considered before becoming a client. You are welcome to contact us if you have any questions about the contents of this brochure - our contact information is listed to the right. Additional information about Floyd Capital Management, LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

The information contained in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Administrator. Furthermore, the term "registered investment advisor" is not intended to imply that Floyd Capital Management, LLC has attained a certain level of skill or training.

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BROCHURE
DATED

1
MAY
2012



MATERIAL CHANGES

ITEM 2

There are no material changes to report. This Disclosure Brochure has been reviewed and is current as of the date indicated on the cover.



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BROCHURE SUPPLEMENTS



ADVISORY BUSINESS

Who We Are

Floyd Capital Management, LLC (hereinafter referred to as “the Company”, “we”, “us” and “our”) is organized as a South Carolina Limited Liability Company and has been a registered investment advisor¹ since January of 1996. We offer portfolio management services designed to assist you, our client², achieve long-term growth and capital appreciation in your investment portfolio.

Owners

The Company is controlled by the following person:

Name	Title	CRD#
John C. Floyd, Jr.	Managing Member & Chief Compliance Officer	210267

Assets Under Management

As of December 31, 2011, our assets under management totaled:

Client Discretionary Managed Accounts..... \$34,100,000

We do not offer non-discretionary investment management services.

What We Do

We manage diversified portfolios of primarily equity (“stock”) positions and fixed income/debt (“bond”) instruments. Depending on our security analysis, company earnings expectations, and market research, an investment portfolio will consist of those securities that we feel can beat popular market indices over a complete market cycle. Your investment portfolio will be made up of one or a combination of both investment approaches:

- ❖ **Capital Appreciation** - Strategies designed to fully participate in bull markets and take advantage of the current economic environment to achieve enhanced equity growth and income performance.
- ❖ **Capital Preservation** - Strategies designed to hedge against market corrections during bear markets and produce consistent, stable investment returns that do not fluctuate so aggressively with daily changes in the financial markets.

You will find more information about our management fees and services under “Portfolio Management” in Item 5, “Fees & Compensation”; and further description of our investment strategies under Item 8, “Methods of Analysis, Investment Strategies & Risk of Loss.”

¹ The term “registered investment advisor” is not intended to imply that Floyd Capital Management, LLC has attained a certain level of skill or training. It is used strictly to reference the fact that we are “registered” as a licensed “investment advisor” with the South Carolina Office of the Attorney General - and with such other State Regulatory Agencies that may have limited regulatory jurisdiction over our business practices.

² A client could be an individual and their family members, a family office, a foundation or endowment, a charitable organization, a corporation and/or small business, a trust, a guardianship, an estate, or any other type of entity to which we choose to give investment advice.



FEES & COMPENSATION

Portfolio Management

Portfolio management is provided on an asset-based fee arrangement. Management fees are calculated based on the aggregate market value of your account on the last business day of the previous calendar quarter multiplied by the corresponding annual percentage rate (i.e., $1.00\% \div 4 = 0.25\%$) for each portion of your portfolio assets that fall within each tier (see “Billing” below under “Protocols for Portfolio Management” for more information on how the fee is calculated).

We retain discretion to negotiate the management fee within each tier on a client-by-client basis depending on the size and complexity of the portfolio managed. In addition, as your portfolio value exceeds each tier level, either through additional deposits or asset growths, a fee break will occur for that portion of your portfolio assets that falls within that next tier level. The tier breaks are as follows:

Account Value	Annual Fee Rate
First \$500,000	1.00%
Next \$500,000	0.75%
Over \$1,000,000	0.50%

We generally require a minimum initial investment of \$500,000 to open a managed account; however, we retain the right to waive or reduce this minimum if we choose to do so.

Protocols for Portfolio Management

The following protocols establish how we handle our portfolio management accounts and what you should expect when it comes to: (i) managing your account; (ii) your bill for investment services; (iii) deposits and withdrawals; and, (iv) other fees charged to your account(s).

Discretion

We will establish discretionary trading authority on all management accounts to execute securities transactions at anytime without your prior consent or advice.

At anytime however, you may impose restrictions, in writing, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.)

Billing

Your account will be billed a blended fee quarterly in advance based on the fair market value for the portion of your portfolio that fall within each tier of our fee schedule. For example:



Account Value: \$3,500,000	Annual Fee % (Per Tier)	Annual Fee (Billed per Tier)
First \$500,000	1.00%	\$5,000
Next \$500,000	0.75%	\$3,750
Amount over \$2,500,000	0.50%	\$12,500
Total Annual Fee:		\$21,250
Blended Annual Fee %	0.6071%	

For new managed accounts opened in mid-quarter, our fee will be based upon a pro-rated calculation of your assets to be managed for the current quarterly period. Advisory fees will be deducted first from any money market funds or cash balances. If such assets are insufficient to satisfy payment of such fees, a portion of the account assets will be liquidated to cover the fees.

Fee Exclusions

The above fees for all of our management services are exclusive of any charges imposed by the custodial firm including, but not limited to: (i) any Exchange/SEC fees; (ii) certain transfer taxes; (iii) service or account charges, including, postage/handling fees, electronic fund and wire transfer fees, auction fees, debit balances, margin interest, certain odd-lot differentials and mutual fund short-term redemption fees; and (iv) brokerage and execution costs associated with securities held in your managed account. There can also be other fees charged to your account that are unaffiliated with our management services. Please see "Custodial Services" under Item 12, "Brokerage Practices" for more information on the custodial firms we will use for brokerage arrangements.

In addition, all fees paid to us for portfolio management services are separate from any fees and expenses charged on mutual fund shares by the investment company or by the investment advisor managing the mutual fund portfolios. These expenses generally include management fees and various fund expense, such as: redemption fees, account fees, and purchase fees may occur but are the exception within managed accounts at institutional custodians. A complete explanation of these expenses charged by the mutual funds is contained in each mutual fund's prospectus. You are encouraged to carefully read the fund prospectus.

Termination of Portfolio Management Services

To terminate our investment advisory services, either party (you or us) by written notification to the other party, may terminate the Investment Advisory Agreement at any time, provided such written notification is received **at least 30 days prior** to the date of termination (i.e.; To terminate services on October 1st, a request for termination should be received in our office by September 1st). Such notification should include the date the termination will go into affect **along with any final instructions** on the account (i.e., liquidate the account, finalize all transactions and/or cease all investment activity).

In the event termination does not fall on the last day of a calendar quarter, **you shall be entitled to a pro-rated refund** of the prepaid quarterly management fee based upon the number of days remaining in the quarter after the termination notice goes into affect. Once the termination of investment advisory services has been implemented, **neither party has any obligation to the other** - we no longer earn management fees or give investment advice and you become responsible for making your own investment decisions.



PERFORMANCE-BASED FEES & SIDE-BY-SIDE MANAGEMENT

ITEM 6

We do not charge fees based on a share of capital gains or the capital appreciation of the assets held in your accounts.

TYPES OF CLIENTS

ITEM 7

The types of clients we offer advisory services to are described above under “Who We Are” in the Item 4, the “Advisory Business” section. Our minimum account size for portfolio management is disclosed above under “Portfolio Management” in Item 5 above in the, “Fees & Compensation” section of this Brochure.

METHODS OF ANALYSIS, INVESTMENT STRATEGIES & RISK OF LOSS

ITEM 8

With the ever-evolving dynamics of our U.S. financial markets, the economy, and the influence of global emerging markets, we feel that a more proactive approach to portfolio management is necessary to achieve the long-term returns you desire. In an ideal world we would want to “buy-and-hold” a stock forever, enjoying the long-term growth of the investment... in today’s economic environment this is an unrealistic expectation. Conventional “buy-and-hold” strategies are not designed to reduce your exposure in fluctuating or declining financial markets.

Our portfolio management services take into consideration these market characteristics and tailor portfolios using a mix of equity (“stock”) positions and fixed income/debt (“bond”) instruments.

Methods of Analysis

In analyzing stock asset classes and bonds to develop an efficient portfolio, we will use a combination of analysis techniques to gathering information and to guide us in our management decisions.

Fundamental Analysis

Fundamental analysis considers: economic conditions, earnings, cash flow, book value projections, industry outlook, politics (as it relates to investments), historical data, price-earnings ratios, dividends, general level of interest rates, company management, debt ratios and tax benefits.

Quantitative Analysis

Quantitative analysis seeks to understand the behavior of a security using mathematical and statistical modeling to measure certain unique characteristics such as, for example, revenues, earnings, margins, and market share. Mathematical and statistical modeling helps us to ascertain security price and risk to ultimately help identify profitable opportunities.



Technical Analysis

Technical analysis utilizes current and historical pricing information to help us identify trends in the broader domestic and foreign equity and fixed income markets, and in the underlying assets themselves. This may involve the use of various technical indicators, such as moving averages and trend-lines, among others.

Cyclical Analysis

Market cycles provide historic tried and true timing mechanisms to indicate turning points in future market prices. By tracking historic data through charts and graphs we can improve entry and exit strategies.

Fundamental analysis provides us with a broad long-term view of a security that begins with determining a company's value and the strength of its financials while quantitative analysis assists us with portfolio optimization techniques. Technical analysis is short-term focusing on the statistics generated by market activity; and, cyclical analysis provides us with historical data on market trends to focus our technical analysis for ideal entry/exit points.

Investment Strategies

We are not bound to a specific investment strategy or ideology for the management of your investment portfolio. We understand markets and **money made** from increased stock values has greater risk (volatility) than **money earned** from dividends (secure and stable) in income-oriented securities. Our goal is to balance making and earning money by maintaining a disciplined management approach, regardless of the strategy, so as to not sacrifice long-term goals for short term gains.

Some of general research tools we utilize are as follows:

- ❖ **Upward Earnings Estimate Revisions** - The heart and soul of our fundamental approach is to utilize the power of earnings estimate revisions made by Wall Street security analysts who daily fine tune upward or downward their earnings expectations. The marketplace reacts to surprises or changes in expectations as stock prices reflect new information about the companies not previously known.
- ❖ **Relative Strength** - Price momentum must accompany good fundamentals so relative strength plays a very important role and typically leads us to stocks with a higher probability of outperforming the market.
- ❖ **Offense or Defense** - We use technical market indicators based on the irrefutable law of supply and demand to determine whether offense or defense is dictated. These indicators have been in existence for almost 40 years.
- ❖ **Bottom-Up Approach** - Our investment criteria is not bound to trying to pick sectors or industries to invest in. Instead, we look at the broad universe of large and mid cap stocks whose earnings estimates and price behavior are up-trending, then consider them for inclusion in a client's portfolio. Diversification and balance are then implemented to control overall risk levels.
- ❖ **Sell Discipline** - We do not want our stocks to be exposed to a continuing negative pattern of earnings estimate reductions and erosive price action. Therefore, tactically we use trailing stock loss prices on all active positions.

There is always a time to buy and a time to sell even the most attractive stocks; we do not feel compelled to be fully invested in stocks when an alternative investment (cash reserves and/or bonds) offers a more attractive opportunity. In fact, it is our belief that avoiding severe losses



is more important in determining overall market performance over the course of an entire market cycle.

Managing Risk

The biggest risk to you is the risk that the value of your investment portfolio will decrease due to moves in the market. This risk is referred to as the **market risk** factor, also known as variability or volatility risk. Other important risk factors:

- ❖ **Interest Rate Risk** - Interest rate risk affects the value of bonds more than stocks. Essentially, when the interest rate on a bond begins to rise, the value (bond price) begins to drop; and vice versa, when interest rates on a bond fall, the bond value rises.
- ❖ **Equity Risk** - Equity risk is the risk that the value of your stocks will depreciate due to stock market dynamics causing one to lose money.
- ❖ **Currency Risk** - Currency risk is the risk that arises from the change in price of one currency against that of another. Investment values in internationally securities can be affected by changes in exchange rates.
- ❖ **Inflation Risk** - The reduction of purchasing power of investments over time.
- ❖ **Commodity Risk** - Commodity risk refers to the uncertainties of future market values and the size of future income caused by the fluctuation in the prices of commodities (i.e., grains, metals, food, electricity, etc...).

The risk factors we have cited here are not intended to be an exhaustive list, but are the most common risks your portfolio will encounter. Other risks that we haven't defined could be political, over-concentration, and liquidity to name a few. However notwithstanding these risk factors, the most important thing for you to understand is that regardless of how we analyze securities or the investment strategy and methodology we use to guide us in the management of your investment portfolio, **investing in a security involves a risk of loss that you should be willing and prepared to bear; and furthermore, past market performance is no guarantee that you will see equal or better future returns on your investment.**

DISCIPLINARY INFORMATION

ITEM 9

We have no legal or disciplinary events to report.

OTHER FINANCIAL INDUSTRY ACTIVITIES & AFFILIATIONS

ITEM 10

We are a fee-only registered investment advisor; none of our supervised persons are licensed, or are related to, another financial industry participant and therefore no disclosure is necessary for this item.



CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS & PERSONAL TRADING

ITEM 11

Code of Ethics

As a fiduciary, the Company has an affirmative duty to render continuous, unbiased investment advice, and at all times act in your best interest. To maintain this ethical responsibility, we have adopted a Code of Ethics that establishes the fundamental principles of conduct and professionalism expected by all personnel in discharging their duties. This Code is a value-laden guide committing such persons to uphold the highest ethical standards, rooted in the most elementary maxim. Our Code of Ethics is designed to deter inappropriate behavior and heighten awareness as to what is right, fair, just and good by promoting:

- ❖ Honest and ethical conduct.
- ❖ Full, fair and accurate disclosure.
- ❖ Compliance with applicable rules and regulations.
- ❖ Reporting of any violation of the Code.
- ❖ Accountability.

To help you understand our ethical culture and standards, how we control sensitive information and what steps have been taken to prevent personnel from abusing their inside position, a copy of our Code of Ethics is available for review upon request.

Client Transactions

We have a fiduciary duty to ensure that your welfare is not subordinated to any interests of ours or any of our personnel. The following disclosures are internal guidelines we have adopted to assist us in protecting all of our clientele.

Participation or Interest

It is against our policies for any owners, officers, directors and employees to invest with you or with a group of clients, or to advise you or a group of clients to invest in a private business interest or other non-marketable investment unless prior approval has been granted by our Chief Compliance Officer, and such investment is not in violation of any SEC and/or State rules and regulations.

Insider Trading Policy

The Company is in compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988. We do not share any non-public information with anyone who does not need to know and has set-up internal controls to guard your personal information.

Class Action Policy

The Company, as a general policy, does not elect to participate in class action lawsuits on your behalf. Rather, such decisions shall remain with you or with an entity you designate. We may assist you in determining whether you should pursue a particular class action lawsuit by assisting with the development of an applicable cost-benefit analysis, for example. However, the final determination of whether to participate, and the completion and tracking of any such related documentation, shall generally rest with you.



Personal Trading

Employees of ours are permitted to personally invest their own monies in securities, which may also be, from time to time, recommended to you. Most of the time, such investment purchases are independent of, and not connected in any way to, the investment decisions made on your behalf. However, there may be instances where investment purchases for you may also be made in an employee's account. In these situations we have implemented the following guidelines in order to ensure our fiduciary integrity:

1. No employee acting as an Investment Advisor Representative, or who has discretion over your account, shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment, unless the information is also available to the investing public on reasonable inquiry. No employee of ours shall prefer his or her own interest to that of yours or any other advisory client.
2. We maintain a list of all securities holdings for all our access employees. Mr. Floyd reviews these holdings on a regular basis.
3. We require that all employees act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
4. Bunched orders (See "Aggregating Trade Orders" under Item 12, "Brokerage Practices") may include employee accounts. In such cases, priority and advantage will be given to satisfy your order first regardless of the situation.
5. Any individual not in observance of the above may be subject to termination.

Personal trading activities are monitored by Mr. Floyd to ensure that such activities do not impact upon your security or create conflicts of interest.

BROKERAGE PRACTICES

ITEM 12

Custodial Services

The Company has established custodial relationships with the following financial institutions:

- ❖ **Merrill Lynch, Pierce, Fenner & Smith Incorporated** - Merrill Lynch is a licensed broker/dealer (member FINRA/SIPC). Custodial arrangements are provided through Merrill Lynch Manage Account Service an SEC registered investment advisor.
- ❖ **TD AMERITRADE, Inc.** - TDA is a licensed broker/dealer (member FINRA/SIPC). Custodial arrangements are provided through TD AMERITRADE Institutional for investment advisors.

Our recommendation for you to custody your assets with either of these financial institutions has no direct correlation to the services we receive and the investment advice we offer you, although we do receive economic benefits through our relationship with these institutions that are typically not available to retail clients.

These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a dedicated trading desk; access to batch trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to accounts); the ability to have advisory fees deducted directly from accounts; access to an electronic communications network for order entry and account



information; access to mutual funds with no transaction fees and to certain institutional money managers.

We are not a subsidiary of, or an affiliated entity of, Merrill Lynch or TDA. We are solely responsible for investment advice rendered, and advisory services are provided separately and independently of these financial institutions.

Direction of Transactions & Commission Rates (Best Execution)

We have a fiduciary duty to put your interests before our own. The advisory support services we received from Merrill Lynch and TDA create an economic benefit to us and a potential conflict of interest to you; in that, our recommendation to custody your account(s) with either of these institutions may have been influenced by these arrangements/services. This is not the case; we have selected these institutions as our custodians of choice based on:

1. Their competitive transaction charges, trading platforms, and on-line services for account administration and operational support.
2. Their general reputation, trading capabilities, investment inventory, their financial strength, and our personal experience working with their staff.

Since we do not recommend, suggest, or make available a selection of custodians other than Merrill Lynch and TDA, and since we have not verified whether their transaction fees are competitive with other custodian, **best execution may not always be achieved**. Therefore, **you do not have to accept our recommendation to use these financial institutions as your custodian**. However if you elect to use another custodian, we may not be able to provide you complete institutional services.

Aggregating Trade Orders

Our objective in order execution is to act fairly, impartially, and to take all reasonable steps to obtain the best possible results (known as “best execution”) for you, as well as with all our clients. Therefore if we are considering bunching orders, we will not bunch (aggregate) orders for a block trade unless: (i) the bunching of orders is done for the purpose of achieving best execution; and, (ii) no client is systematically advantaged or disadvantaged by bunching the orders.

In consideration of these objectives, we will take into account the unique execution factors of the buy/sell order before bunching accounts for a block trade. A few of those factors are:

- ❖ **Security Trading Volume** - Bunching orders in a block trade can secure price parity and continuity for our clients during heavy trading activity.
- ❖ **Number of Clients** - The fewer the number of client accounts involved in the bunched order may not yield better pricing or order execution; it may be more advantageous to perform an individual market order for each client. In addition preparing individual market orders, for the small number accounts involved, may be quicker to complete than preparing a bunch order.
- ❖ **Financial Instruments** - The type of security involved as well as the complexity of order can affect our ability to achieve best execution.

If you would like more detailed information on our trading allocation policies, a copy is available for review upon request.



REVIEW OF ACCOUNTS

ITEM 13

Our management service is active portfolio management and each account is reviewed daily in the normal course of market observation by Mr. John "Jack" Floyd. All accounts are reviewed in the context of your stated investment objectives. Cash needs will be adjusted as necessary.

You will receive, at least quarterly, statements from the custodian where your account is custodied. Each statement will summarize the specific investments currently held, the value of your portfolio and account transactions. You are encourage to review these statements for accuracy.

You are also encouraged to review with us investment strategies and account performance on an annual basis. Material changes in your personal circumstances, the general economy, or tax law changes can trigger more frequent reviews. However, it is your responsibility to communicate these changes to us so that the appropriate adjustments can be made.

CLIENT REFERRALS & OTHER COMPENSATION

ITEM 14

Referral Compensation

We do not receive any economic benefit from an independent party for managing any of our clients' accounts. In addition, we do not compensate persons/firms for client referrals.

Other Compensation (Indirect Benefit)

The Company receives an indirect economic benefit from Merrill Lynch and TDA (See "Custodial Services" above under Item 12, "Brokerage Practices" for more detailed information on these services and products could be.).

CUSTODY

ITEM 15

Management Fee Deduction

We do not take possession of or maintain custody of your funds or securities, but will simply monitor the holdings within your portfolio and trade your account based on your stated investment objectives and guidelines. Physical possession and custody of your funds and/or securities shall be maintained with either Merrill Lynch or TDA as indicated above in Item 12, "Brokerage Practices."

We are however defined as having custody since you have authorized us to deduct our advisory fees directly from your account. To protect you as well as to protect our advisory practice, we have implemented the following regulatory safeguards:

- ❖ We report to the regulatory authority (the South Carolina Office of Attorney General) having jurisdiction over our advisory practice that we have custody.
- ❖ Your funds and securities will be maintained with a qualified custodian (Merrill Lynch or TDA) in a separate account in your name.



- ❖ Authorization to withdrawal our management fees directly from your account will be approved by you prior to engaging in any portfolio management services.

Merrill Lynch and TDA are required by law to send you, at least quarterly, brokerage statements summarizing the specific investments currently held in your account, the value of your portfolio, and account transactions. **You are encouraged to compare the financial data contained in any report we may prepare for you with the financial information disclosed in your account statement from either Merrill Lynch and/or TDA to verify the accuracy and correctness of our reporting.**

INVESTMENT DISCRETION

ITEM 16

Securities & Amount Bought or Sold

We have you complete our Investment Advisory Agreement which sets forth our authority to buy and sell securities in whatever amounts are determined to be appropriate for your account and whether such transactions are with, or without, your prior approval.

You may, at anytime, impose restrictions, **in writing**, on our discretionary authority (i.e., limit the types/amounts of particular securities purchased for your account, exclude the ability to purchase securities with an inverse relationship to the market, limit our use of leverage, etc.).

VOTING CLIENT SECURITIES

ITEM 17

We do not vote client proxies. You understand and agree that you retain the right to vote all proxies, which are solicited for securities held in your managed accounts. Any proxy solicitations inadvertently received by us will be immediately forwarded to you for your evaluation and decision.

However if you have specific questions regarding an action being solicited by the proxy that you do not understand or you want clarification, you may contact us and we will explain the particulars. Keep in mind we will not advise you in a direction to vote, that ultimate decision will be left to you.

FINANCIAL INFORMATION

ITEM 18

We are not required to include financial information in our Disclosure Brochure since we will not take physical custody of client funds or securities or bill client accounts six (6) months or more in advance for more than \$500.

We are not aware of any current financial conditions that are likely to impair our ability to meet our contractual commitments to you.



REQUIREMENTS FOR STATE-REGISTERED ADVISERS

ITEM 19

Information on each of our principal executive officers and management persons can be found in the attached "Brochure Supplements".

END OF DISCLOSURE BROCHURE

FORM ADV: PART 2B

BROCHURE SUPPLEMENT



Floyd Capital Management, LLC

4536 Richmond Hill Drive
Murrells Inlet, SC 29576

Tel: 843.357.3700
Fax: 843.357.3701

SUPERVISION

John C. Floyd, Jr.
Chief Compliance Officer
e-mail: floydcap@msn.com

Mr. Floyd is responsible for the regulatory oversight of our advisory practice - ensuring that we are operating in compliance with federal and state regulations.

His other responsibilities include, but are not limited to, supervising investment activities and performing client reviews and meeting to discuss investment options.

BROCHURE SUPPLEMENT
DATED

1

MAY
2012

This Brochure Supplement provides information about John C. Floyd, Jr. that is an accompaniment to the Disclosure Brochure for our firm, Floyd Capital Management, LLC. You should have received both of these together as a complete disclosure packet. If you did not receive our Disclosure Brochure or if you should have questions about this Brochure Supplement for Mr. Floyd, you are welcome to contact us - our contact information is listed to the left.

Additional information about Floyd Capital Management, LLC and John C. Floyd are also available on the SEC's website at www.adviserinfo.sec.gov.

John C. Floyd, Jr. (Jack)

CRD#: 210267

Year of Birth: 1935

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Education

1957 - University of South Carolina: Bachelor of Science in Economics

Licenses

FINRA Exams: Series 1 - Registered Representative Examination (Retired)
Series 5 - Interest Rate Options Examination (Retired)
Series 8 - General Securities Sales Supervisor (Retired)
Series 15 - Foreign Currency Options Examination (Retired)
Series 63 - Uniform Securities Agent State Law Examination (Retired)
Series 65 - Uniform Investment Adviser Law Examination (Active)

Business Background

01/1996 - PresentFloyd Capital Management, LLC
Position: Managing Member & Chief Compliance Officer
06/1959 - 01/1996Merrill Lynch, Pierce, Fenner & Smith Incorporated
Position: Account Executive/Financial Consultant

DISCIPLINARY INFORMATION

Mr. Floyd has no legal or disciplinary events to report.

OTHER BUSINESS ACTIVITIES

Mr. Floyd is not involved in any other business activities. Full focus of his attention is directed to meeting your investment needs.

ADDITIONAL COMPENSATION

Mr. Floyd does not receive any economic benefit, sales awards, prizes or bonuses that are based on the number or amount of sales, client referrals, or from opening new accounts.

REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Mr. Floyd has not been the subject of any arbitration claim, civil litigation, self-regulatory organization/administrative proceeding, or bankruptcy petition at any time during the past ten years.



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