
Item 1 – Cover Page

Atlantic Capital Management of Florida,
Inc.

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alhambrapartners.com

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This Brochure provides information about the qualifications and business practices of **Atlantic Capital Management of Florida, Inc. (ACM)**. If you have any questions about the contents of this Brochure, please contact us at **561-686-6844** or **jessica@alhambrapartners.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.

ACM 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 Atlantic Capital Management is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

There are no material changes since our last brochure update.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further 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 Jessica L. Hudak, Director of Operations at 561-686-6844 or jessica@alhambrapartners.com.

Additional information about ACM 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 ACM who are registered, or are required to be registered, as investment adviser representatives of ACM.

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Brochure Supplement(s): Jeffrey P. Snider	

Item 4 – Advisory Business

Atlantic Capital Management of Florida, Inc. (legal name), with offices in Palmetto Bay, West Palm Beach, FL, and Buffalo, NY, was incorporated on June 28, 1995. Collectively, from this point forward we will refer to ourselves as “ACM”.

ACM operates as a wholly-owned subsidiary of Alhambra Investment Partners, LLC, also an SEC-registered investment advisor. Information on Alhambra’s investment advisory business, including its disclosures and brochures, is available upon request. Jeffrey Snider will be employed by AIP and continue as portfolio manager for all ACM clients under a sub-advisory agreement between ACM and AIP. ACM’s association with AIP adds a broad range of investment experience and research capabilities that will now be available to Mr. Snider in the management of ACM client portfolios. Please visit Alhambra’s website for more information about their team of investment professionals: www.alhambrapartners.com/our-team.

ACM furnishes investment supervisory services that involve the continuous management of client portfolios with the goal of meeting client objectives within well- defined risk/reward parameters. We implement the investment strategy, referring to AIP’s investment process, using a broker/custodian arrangement determined by the client and report quarterly on the progress toward meeting the specific objectives established.

Clients may add restrictions to our portfolio security selections.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by ACM is established in a client's written agreement with ACM.

ACM charges advisory fees on a quarterly basis as a percent of market value. On each quarterly review date, ACM will calculate the market value of the account(s), apply the fee schedule below and divide by four to produce the quarterly fee due.

Schedule of Annual Fees

1.00% on the first \$1,000,000 of market value

.75% on the next \$1,000,000 of market value

.60% on the next \$2,000,000 of market value

.50% on all over \$4,000,000 of market value

Minimum fee: \$3,000 per annum

Portfolio management fees on are negotiable.

Portfolio management fees for charitable institutions are discounted 20%.

Fees are charged quarterly, first fee is payable within thirty days of signing. Quarterly fee calculation will take place based on the date of the first advisory fee. The contract may be terminated by the client within five days with no penalty or amount due. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable.

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 ACM to directly debit fees from client accounts.

ACM'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 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 a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to ACM's fee, and ACM shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that ACM 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

ACM 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

ACM provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, trust programs.

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

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

ACM's investment process is to use the products and services offered by AIP, including, but not limited to, investment decisions based on strategy, tactical allocations, specific security selection, research, etc. Specific information on AIP's Strategies and Risk Management, as well as the entire investment process, is available in the AIP ADV Part IIA brochure, furnished at any time upon request or through AIP's SEC filings and website.

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 ACM or the integrity of ACM's management. ACM has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

As stated in Item 4 above, ACM is affiliated with Alhambra Investment Partners, LLC, as its wholly-owned subsidiary.

Item 11 – Code of Ethics

ACM has adopted a Code of Ethics for all supervised persons of the firm describing its high 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, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at ACM must acknowledge the terms of the Code of Ethics annually, or as amended.

ACM anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which ACM has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which ACM, its affiliates and/or clients, directly or indirectly, have a position of interest. ACM's employees and persons associated with ACM are required to follow ACM's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of ACM and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for ACM's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of ACM 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. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of ACM's clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, 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 continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between ACM and its clients.

It is ACM's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. ACM 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.

ACM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Jessica L. Hudak.

Item 12 – Brokerage Practices

ACM does not currently engage in soft dollar relationships with any brokerage firm.

ACM does not have any referral arrangements with any brokerage firms.

ACM allows clients to select custodial/brokerage relationships at their own discretion. For clients that do not have an existing relationship or wish to change current relationships, we suggest using Charles Schwab. ACM does not derive any benefit, economic or otherwise, from Charles Schwab. Our recommendation is solely based on operational capabilities, brokerage capabilities and costs, as well as overall execution and cost of custodial and trading services.

Item 13 – Review of Accounts

Each portfolio is reviewed constantly, at least bi-weekly, to insure proper asset allocation. The portfolio manager confers with the assistant manager on an account by account basis. When individual securities are targeted for purchase or sale, that also triggers a review with respect to cash flow and suitability. Portfolio managers review all accounts. No more than 100 client relationships are assigned to any reviewer.

An investment review, including a portfolio summary and detailed appraisal (showing every security position, tax cost, and market value), is provided quarterly in a client meeting, by email or by mail (client selects method of delivery). Reports are also sent upon client request.

Annual tax reports are sent to clients that request them.

Item 14 – Client Referrals and Other Compensation

ACM has no information applicable to this Item.

Item 15 – Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. ACM 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.

When a client selects a bank trust department as custodian and does not otherwise direct brokerage activity, we use one or more brokers depending on specific needs for any trades. Fixed income securities are purchased from brokers or dealers that have a proven record of meeting our standards for quality within price. In practice, we use firms that routinely have a wide array of inventory. For stock trades, we look for reasonable discounts within best execution. Our demands for discounts take in the full range of services provided by a broker. When our clients select a stock brokerage firm as custodian, they are aware of the firm's commission structure. When DVP trades are executed for those using bank custodians we require a discount relative to the work involved. Simple market orders involving widely traded issues demand the deepest discounts. For those using discount brokers with whom we have an institutional relationship, the benefit of a negotiated flat rate applies.

Item 16 – Investment Discretion

ACM 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.

ACM's advisory agreement details the authority that the client will give ACM to execute its investment relationship. Further authority is given to ACM at custodians in the form of a Limited Power of Attorney (LPOA). Client has the ability to determine the specific authorities given to ACM within each LPOA agreement (generally this includes ability to buy/sell securities within the account, transfer cash to and ONLY to the client at the client's address of record, and deduct advisory fees from the account).

When selecting securities and determining amounts, ACM through AIP observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, ACM's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to ACM in writing.

Item 17 – Voting *Client* Securities

Clients may obtain a copy of ACM's complete proxy voting policies and procedures upon request. Clients may also obtain information from ACM about how ACM voted any proxies on behalf of their account(s).

Clients have the option of voting proxies on their own behalf directly or allowing ACM to vote for them.

ACM will review each voting issue with respect to its impacts on each company and analyze whether managements' proposals are consistent with our overall investment thesis. Each proxy voting analysis is completed from the perspective of ACM's clients.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about ACM's financial condition. ACM 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.