

**Part 2A of Form ADV: Campbell Capital Management Brochure**  
**Campbell Capital Management**  
**7301 SW 57<sup>th</sup> Ct., Suite 540**  
**Miami, FL 33143**  
**305-670-3140**  
[info@camcap.com](mailto:info@camcap.com)  
[www.camcap.com](http://www.camcap.com)

## Item 1 - Cover Page

01/01/2024

This brochure provides information about the qualifications and business practices of Campbell Capital Management, its President, Clay G. Campbell, and Vice President, Kyle D. Campbell. If you have any questions about the contents of this brochure, please contact Kyle D. Campbell at 305-670-3140 and/or [info@camcap.com](mailto:info@camcap.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. Clay G. Campbell, and Kyle D. Campbell are registered investment advisors. Registration of an investment advisor does not imply any level of skill or training.

The oral and written communications of an advisor provide you with information with which you determine to hire or retain an advisor. Clay G. Campbell founded Campbell Capital Management in 1988. His BS degree is from Florida State University. Kyle D. Campbell joined Campbell Capital Management in 2018. His MACCY degree is from George Washington University.

Additional information about Clay G. Campbell, and Kyle D. Campbell is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

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## Item 2 - Material Changes

This item will discuss only specific material changes that are made to the brochure and provide clients with summary of these changes. We will also reference the date of our last annual update of this brochure (01/01/2024). In the past we have offered or delivered information about our qualifications and business practices to clients on an annual basis. Pursuant to new SEC rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 90 days of the close of the 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, this brochure may be requested by visiting our website [www.camcap.com](http://www.camcap.com) or contacting Campbell Capital Management at 305-670-3140 or [info@camcap.com](mailto:info@camcap.com). This brochure is available free of charge.

Additional information about Clay G. Campbell, and Kyle D. Campbell is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov). This website also provides information about any persons affiliated with Campbell Capital Management who are registered, or are required to be registered, as investment advisor representatives of Campbell Capital Management.

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**The two supplements shown below are not applicable to Campbell Capital Management. Therefore, Campbell Capital Management is not required to include the two supplements in its brochure.**

**- Part 2A, Appendix 1: The “Wrap Brochure”** - Campbell Capital Management does not sponsor a wrap fee program. Therefore, **Part 2A, Appendix 1** is not applicable to Campbell Capital Management.

**- Part 2B: The “Supplement”** – Campbell Capital Management has two supervised persons, therefore a biographical and disciplinary information page, which is **Part 2B: The “Supplement”** is included at the end of this document.

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## Item 4 - Advisory Business

Campbell Capital Management provides a copy of ADV Part 2 to every client and a copy will be provided to any prospective client upon request. Fees are negotiable and declared upon acceptance of the verbal advisory agreement. The factors considered are the size of the account and the type of assets managed. Assets under management as of 12/31/2023: \$244,976,324.

## Item 5 - Fees and Compensation

All fees are subject to negotiation and declared upon acceptance of the verbal advisory agreement. The factors considered are the size of the account and the type of assets managed. Campbell Capital Management bills its fees on a quarterly basis.

Clients are billed in arrears. Clients will be billed directly for fees; they will be directly debited from the client's accounts. Management fees are prorated each quarter based on the balance in the account at the end of each month. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee. Upon termination of any account, unpaid fees will be due and payable.

Campbell Capital Management charges no fee for investment advice or planning. Clay G. Campbell nor Kyle D. Campbell hold themselves out to the public as financial planners because the only financial planning they do is to determine an investment strategy for clients. Campbell Capital Management manages clients' funds and securities for a percentage of assets under management.

Generally, the fee is 1.50% of assets under management per year depending on the complexity of a client's account. Campbell Capital Management also provides tax consulting services on an hourly basis. The hourly fee is up to \$300. The fee is paid in arrears. Campbell Capital Management'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 fund 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 Campbell Capital Management's fee, and neither Campbell Capital Management, Clay G. Campbell nor Kyle D. Campbell shall receive any portion of these commissions, fees, and costs.

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

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

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## Item 7 – Types of Clients

Campbell Capital Management provides portfolio management services to individuals, businesses, trusts, and pension plans.

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

Investing in securities involves risk of loss that clients are prepared to bear, we discuss this risk with our clients while agreeing to the terms of our verbal advisory agreement. Firstly, during the verbal advisory agreement discussion Clay G. Campbell or Kyle D. Campbell meet(s) with the client to decide on percentage allocations to various asset classes, such as U.S. stocks, international stocks, mutual funds, bonds, and cash. The allocations are then implemented. For example: The fixed income portion of the portfolio is invested in bank (FDIC) insured certificates of deposit, corporate bonds, municipal bonds, closed or open-end bond funds and/or Treasuries. Maturity dates are staggered with maturity dates not longer than twenty years. The equity portion of the client's portfolio is invested in a diversified mix of stocks or open and closed end mutual funds.

The clients' portfolios are reviewed regularly. Regardless of market conditions, clients are encouraged to stick with the asset allocation they said they prefer. The risk of investing in a bank (FDIC) insured certificates of deposit is the bank may fail and the FDIC may not have enough money to cover losses. Also, banks can change the interest rate they promised the investor. And a bank is not required by law to return the investors principal right away—they can hold it for a while.

The risk of investing in stocks and mutual funds is that they are volatile—they can lose value. Trading of securities can affect investment performance, particularly through increased brokerage and other transaction costs and taxes, so Campbell Capital Management holds investments for the long term and does not do frequent trading.

## Item 9 – Disciplinary Information

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Clay G. Campbell or Kyle D. Campbell or the integrity of their management. Clay G. Campbell nor Kyle D. Campbell have ever been subject to any legal or disciplinary events, there is no further information applicable to Item 9.

## Item 10 – Other Financial Industry Activities and Affiliations

Clay G. Campbell nor Kyle D. Campbell have any other financial industry activities and affiliations other than with Campbell Capital Management.

## Item 11 – Code of Ethics

Campbell Capital Management's Code of Ethics sets forth standards of conduct and requires compliance with securities laws. Its policies and procedures relating to personal investment activities are below. Clay G. Campbell is the firm's founder and President. The Code

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of Ethics document can be requested at any time by emailing [info@camcap.com](mailto:info@camcap.com).

**Confidentiality:** Campbell Capital Management does not share or sell client information in any way, shape, or form. As discussed during the verbal advisory agreement.

**Conflicts of interest:** Campbell Capital Management does not receive economic benefit from any of the broker/dealers that he recommends. He currently recommends Lasalle Street Securities Inc. based on reasonableness of commissions for services they provide. Clay G. Campbell receives an economic benefit from LaSalle Street Securities Inc., he can trade his personal account free of charge. As discussed during the verbal advisory agreement.

**Trading:** Campbell Capital Management buy and sell some of the same securities that are traded for clients. Investment decisions are based on the client's investment objective. Campbell Capital Management anticipates that, in appropriate circumstances, consistent with clients' investment objectives, he will cause accounts over which he has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which he directly or indirectly has a position of interest. Clay G. Campbell and Kyle D. Campbell may trade for his own accounts in securities which are recommended to and/or purchased for his clients. The Firm's Code of Ethics is designed to assure that the personal securities transactions will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions. Trading is continually monitored to reasonably prevent any conflicts of interest. Additionally, Campbell Capital Management engages in block trading, in order to ensure trades are allocated fairly among clients Campbell Capital Management employs a percentage of cash balance methodology to which we attempt to maintain similar cash balances across all client accounts. As discussed during the verbal advisory agreement.

**Fiduciary duty:** Clay G. Campbell and Kyle D. Campbell have a fiduciary duty to their clients. Campbell Capital Management's Code of Ethics involves 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. As discussed during the verbal advisory agreement.

**Records:** Campbell Capital Management will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially filled orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order. As discussed during the verbal advisory agreement.

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## Item 12 – Brokerage Practices

Campbell Capital Management does not participate in any soft dollar benefits. Trades are limited to general securities, mutual funds, government securities, corporate bonds and Insured Certificates of Deposit. Clay G. Campbell and Kyle D. Campbell manage accounts on a discretionary basis but prohibit themselves from withdrawing funds and/or securities from clients' accounts. No limitations are placed on the amount of securities that can be bought or sold within any pre-agreed portfolio allocation. Campbell Capital Management evaluates commissions paid to brokerage firms on their competitiveness and execution, not necessarily that they have the lowest cost. Clients are free to select any broker/dealer they wish although they may be unable to achieve best execution and they may not benefit from volume or other discounts and directed trades may be placed after trades on discretionary accounts.

## Item 13 – Review of Accounts

Clients' accounts are reviewed weekly. Accounts are reviewed more frequently if there is any unusual activity in the securities held by such account. Clients' get a quarterly statement and a quarterly portfolio evaluation. As discussed during the verbal advisory agreement.

## Item 14 – Client Referrals and Other Compensation

Fees are paid to one professional, known as a solicitor, for their client referrals. The following professional provides client referrals to CCM in return for quarterly finders' fees based on account assets under management:

- Mark Hamende at Lasalle Street Investment Advisors L.L.C.

The SEC has adopted strict rules for advisers when accepting third party referrals. We follow written policies and procedures to ensure compliance with these rules, including those governing compensation and written client disclosure. If you are referred to us by a solicitor, we pay a referral fee as allowed under SEC rules. The referral fee will be paid entirely from our investment advisory fee; you will not pay an added fee for the referral. The solicitor must tell you about his/her relationship with us at the time of solicitation deliver a copy of this Form ADV Part 2A, and provide a written disclosure explaining the terms of an arrangement.

If you are a referred client, you should be aware of inherent conflicts of interests that exist between you and CCM with respect to the solicitation agreement described above and in separate documents (Master Solicitor Agreement and CCM Solicitors Fee Disclosure). Solicitors may refer potential clients to us because they will be paid a fee and not because we provide investment strategies that are appropriate and suitable for the client. To mitigate this conflict, CCM retains ultimate discretion to accept client referrals from solicitors.

## Item 15 – Custody

Clients receive quarterly statements from Campbell Capital Management. The broker-

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dealer, bank or other qualified custodian who holds and maintains our client's investment assets sends statements at least quarterly. Funds are currently held at National Financial Services. Campbell Capital Management urges clients to carefully review such statements and compare such official custodial records to the account statements that we may provide to them. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## Item 16 – Investment Discretion

Campbell Capital Management 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 client account. When selecting securities and determining amounts, Clay G. Campbell and Kyle D. Campbell observe the investment policies, limitations and restrictions of the clients for which they are advising. Investment guidelines and restrictions must be provided to Campbell Capital Management in writing.

## Item 17 – Voting Client Securities

As a matter of firm policy and practice, Campbell Capital Management do not have any authority to and do 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. Clay G. Campbell or Kyle D. Campbell may provide advice to clients regarding the clients' voting of proxies.

## Item 18 – Financial Information

Registered investment advisors are required in this Item to provide you with certain financial information or disclosures about Campbell Capital Management, Clay G. Campbell and Kyle D. Campbell's financial condition. Campbell Capital Management, Clay G. Campbell and Kyle D. Campbell have no financial commitments that impair their ability to meet contractual and fiduciary commitments to clients and have not been the subject of a bankruptcy proceeding.

## Item 19 – Requirements for State-Registered Advisors

Campbell Capital Management is registered with the Securities and Exchange Commission only. Information about Campbell Capital Management, Clay G. Campbell and Kyle D. Campbell has been provided in this brochure.

## Item 20- Part 2B Supplement Disclosing Individual Advisory Personnel

Clay G. Campbell graduated from South Dade Senior High School in 1975. He then attended Florida State University where he received a BS with a major in accounting in 1980. Upon Completing his education Clay G. Campbell became a CPA in 1981 and then went to work with Arthur Andersen performing income tax compliance and consulting work for individuals and entities for approximately 5 years. He founded Campbell Capital Management in 1988 and has worked here since.



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Clay G. Campbell has no disciplinary information, other securities business activities nor additional compensation to disclose. Clay G. Campbell can be reached at (305) 670-3140 or [cc@camcap.com](mailto:cc@camcap.com).

Kyle D. Campbell graduated from Miami Palmetto Senior High School. He then attended George Washington University where he received a BACCY in 2013 and a MACCY in 2014. Upon Completing his education Kyle D. Campbell went to work with KPMG performing due diligence on Commercial Mortgage Backed Securities, he worked there for approximately three years. He then spent approximately a year and a half at Waterfall Asset Management performing valuations of Fixed Income Securities. Kyle D. Campbell joined Campbell Capital Management in 2018 and received his Series 65 accreditation in 2019.

Kyle D. Campbell has no disciplinary information, other securities business activities nor additional compensation to disclose. Kyle D. Campbell can be reached at (305) 670-3140 or [kyle@camcap.com](mailto:kyle@camcap.com).