

## **Uniform Application for Investment Adviser Registration Disclosure Brochure**

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**This part of Form ADV gives information about the investment adviser and its business for the use of clients. The information has not been approved or verified by any government authority. Although Camelotta Advisors refers to itself as a “registered investment advisor”, this registration does not imply a certain level of skill or training.**

### **Material Changes**

There are no material changes in this brochure

### **Advisory Services and Fees**

Camelotta Advisors, Inc. (hereinafter “Camelotta ” or the “Firm”) is a Corporation, formed under the laws of the State of Texas, and registered with the Securities and Exchange Commission as a registered investment adviser. The firm currently manages \$40,058,107 in assets.

Advisory recommendations are based on the client’s financial situation at the time the services are provided and are based on financial information disclosed by the client to Camelotta. Clients are advised that certain assumptions may be made with respect to interest and inflation rates and the use of past trends and performance of the market and economy. Past performance is in no way an indication of future performance. As the client’s financial situation, goals, objectives, or needs change, the client must notify Camelotta promptly.

Camelotta shall never have custody of any client funds or securities, as the services of a qualified and independent custodian will be used for these asset management services.

On an annualized basis, Camelotta ’s fee for continuous portfolio management services range from ½ of 1% to 2% of the assets under management, depending on the amount of assets to be managed and the complexity of the portfolio. The final fee negotiated will be based on the complexity of the client’s financial situation and the portfolio(s) to be managed. The annual fees for portfolio management services are typically billed at the end of the quarter based on the market value of the assets on the last day of the quarter. These fees are billed directly to the client account. The fee-paying arrangements for fixed and/or hourly charges will be determined on a case-by-case basis and will be detailed in the signed agreement for services. The client will be invoiced directly for the fees, and fees will be assessed pro rata in the event the management agreement is executed at any time other than the first day of a calendar quarter.

The fees charged are calculated as described above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory client (15 U.S.C. §80b-5(a)(1)).

Advice offered by Camelotta may involve investments in money market funds. Clients are hereby advised that all fees paid to Camelotta for investment advisory services are separate and distinct from the fees and expenses charged by money market funds (described in each fund’s prospectus) to their shareholders. These fees may include, but are not limited to, a management fee, upfront sales charges, and other fund expenses. Further, there may be transaction charges involved with purchasing or selling of securities. Camelotta does not share in any portion of the brokerage fees/transaction charges imposed by the custodian holding the client funds or securities. The client should review all fees charged by money market funds, Camelotta, and others to fully understand the total amount of fees to be paid by the client.

Camelotta prepares and sends quarterly reports to clients. Clients get statements from their broker/dealers, mutual funds and other money managers, as appropriate.

Lastly, Camelotta may select, with clients’ consent, other SEC or state registered money managers that Camelotta will monitor on the clients’ behalf. When Camelotta does so, the selected money managers might pay Camelotta a portion of the fees generated by the referred client.

### **Types of clients**

Camelotta offers investment advisory services to individuals, pensions and profit sharing plans, trusts, estates, charitable organizations, corporations or other organizations. The firm has no minimum account size.

### **Types of investments**

Camelotta offers advice on a wide range of securities including equities (exchange-traded, over the counter, and non-domestic issues), fixed income (corporate, money market securities, commercial paper, certificates of deposit, municipal, US and non-US government) options on securities and commodities, futures contracts on tangible and intangible assets, investment company securities (variable life insurance, variable annuities, and mutual fund shares) and partnership interests in real estate, oil and gas. Information about securities and markets is derived from financial newspapers and magazines, research articles prepared by others, corporate rating services and documents released by the security issuers including annual reports, prospectuses, press releases and filings with the Securities and Exchange Commission.

Camelotta provides discretionary portfolio management services where the investment advice provided is custom tailored to meet the individualized needs and investment objectives of the client. Subject to any written guidelines, which the client may provide, the Firm may be granted the discretion and authority to manage the account. Accordingly, Camelotta is authorized to perform various functions, at the client's expense, without further approval from the client. Such functions include the determination of securities to be purchased/sold and the amount of securities to be purchased/sold. Once the portfolio is constructed, Camelotta provides continuous supervision of the portfolio as changes in market conditions and client circumstances may require. Managed accounts are reviewed at least weekly. Financial planning accounts are reviewed annually. The calendar is the triggering factor. Accounts at other money managers are reviewed when the applicant receives their statements- usually quarterly. Dana Grigg reviews all client accounts. He does so on a portfolio analysis basis using fundamental and technical factors. Camelotta also provides financial planning advice in which certain securities may be recommended. Camelotta does not vote proxies on behalf of its clients.

Investing in securities involves the risk that a client will lose part or all of their investment. The fundamental and technical factors utilized involve the risk that they are based upon historical data which may have little or no predictive value. They also make certain assumptions about market liquidity, exchange performance, pricing accuracy which may prove to be incorrect.

Camelotta will provide advisory consulting services, which will usually consist of the evaluation of various investment options associated with client funds, typically taxable or tax-exempt bond proceeds, operating funds, and program revenues. The services and recommendations provided will be advisory in nature, and based upon an analysis of the clients individual needs. Although the Advisory Consulting Services will often times be provided to clients that have engaged the Firm for portfolio management services, the Firm may offer this service to any other client in need of such services.

Advisory Consulting services are provided on an hourly fee basis in accordance with the following fee schedule:

- **Hourly Fees:** Camelotta's hourly fees may be up to \$300 and are also payable upon completion

of the contracted services.

- **Fixed fees:** In certain cases, Camelotta will charge a fixed fee for services. This fee is non-refundable.

When the scope of the advisory consulting services has been agreed upon, a determination will be made as to the type and amount of the applicable fee. The final fee, subject to negotiation, is directly dependent upon the facts and circumstances of the client's financial situation and the complexity of the advisory program service(s) requested. The fees charged for services provided will be detailed in the signed agreement with the Firm. In limited circumstances, the cost/time could potentially exceed the initial estimate. In such cases, Camelotta will notify the client and may request that the client pay an additional fee.

Either party may terminate the agreement by providing written notice to the other party within five (5) days of entering into the agreement. The client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the client. Refunds will be given on a pro-rata basis.

#### **Education and Business Background**

Grigg, Dana Joe Lee: Born in 1969; BA Economics from Stanford University (1992) and Master of Business Administration from Harvard University (2000). JP Morgan Securities (1992-1994) worked as a capital markets analyst, trader, and marketer and as a trading strategist with Barclays Global Investors from (1994-1996). Mr. Grigg worked as a business developer and financial analyst for Trilogy in Austin, Texas from August of 2000 to September of 2001. Since 2001 he has been the President and General Manager of Camelotta Advisors, Inc.

#### **Other Business Activities**

Camelotta's Investment Adviser Representative, Mr. Grigg's primary business involves litigation support services including financial analysis and expert witness testimony for clients involved in complex litigation primarily involving family law. This practice is conducted under the business line called "Divorce Analysis".

#### **Participation or Interest in Client Transactions**

Camelotta or individuals associated with the Firm may buy or sell – for their personal account(s) - investment products identical to those recommended to clients. It is the expressed policy of Camelotta that no person employed by the Firm may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

#### **Code of Ethics**

As these situations may represent a conflict of interest, Camelotta has established the following restrictions in order to ensure its fiduciary responsibilities:

- Camelotta emphasizes the unrestricted right of the client to specify investment objectives, guidelines, and/or conditions on the overall management of their account. Camelotta's standard investment process begins with reviewing applicable state statutes, investment policy, and permitted investment language provided by the client.
- Associated persons or their immediate family members shall not buy or sell securities for

their personal portfolio(s) where their decision is derived in whole or in part, by reason of the associated person's employment, unless the information is also available to the investing public on reasonable inquiry. No associated person of the Firm shall prefer his or her own interest to that of the advisory client.

- Camelotta and its associated persons generally may not purchase and sell securities being considered for, or held by client accounts without pre-clearance of the Firm's Compliance Officer. Moreover, investment personnel may be subject to a blackout period from trading in such securities.
- Camelotta and its employees generally may not participate in private placements or initial public offerings (IPOs) without pre-clearance from the Firm's Compliance Officer.
- The Firm requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
- Records will be maintained of all securities bought or sold by the Firm, associated persons of the Firm, and related entities. Mr. Grigg will review these records on a regular basis.
- Any individual not in observance of the above may be subject to termination.

In accordance with Section 204-A of the Investment Advisers Act of 1940, Camelotta also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Camelotta or any person associated with the Firm.

#### **Conditions for Managing Accounts**

Camelotta does not require any conditions for starting, managing, or maintaining clients' accounts.

#### **Investment or Brokerage Discretion**

Adviser has the authority without specific client consent to determine the securities to be bought or sold. It should be noted that Adviser, in conjunction with the client, selects the broker dealer to be used and that Adviser does not negotiate commissions paid by individual clients, except as part of a package price or discount paid by all clients using that broker dealer. Adviser does not have custody of client funds or authority to remove funds from clients' accounts except to instruct the custodian to return funds directly to clients or to deduct advisory fees from the account on a quarterly basis.

#### **Suggestion of Brokers**

Advisor may execute or recommend that clients execute their securities transactions through various firms. The choice of which firm to execute trades through will be determined on the financial strength of the broker or dealer, its reputation, pricing and ability to execute trades in a timely manner.

Advisor may execute or recommend that clients execute their securities transactions through various firms including, but not limited to broker-dealers such as Fidelity Institutional Registered Investment Adviser Group ("FRIAG") through Fidelity Brokerage Services LLC. FRIAG may charge commissions (ticket charges) for executing Adviser's transactions. Adviser does not receive any part of these separate charges which are assessed directly to clients. FRIAG does not have a role with respect to Adviser's investment advisory accounts, however it may serve as the broker-dealer in cases where clients wish to execute recommendation as part of the implementation of a financial plan. It is important to note that FRIAG does not maintain

supervisory relationships with respect to Adviser or its representatives nor are they in any way affiliated with it. Adviser is independently owned and operated.

Adviser may recommend/require that clients establish accounts with FRIAG to maintain custody of clients' assets and to effect trades for their accounts. FRIAG may provide Adviser with access to their institutional trading and custody services, which are typically not available to FRIAG retail investors. FRIAG's services include brokerage custody, research 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 Adviser's Clients' accounts maintained in their custody, FRIAG does not charge separately for custody but are compensated by account holders through commissions or other transaction-related fees or securities trades that are executed through FRIAG or that settle into FRIAG accounts.

FRIAG also makes available to Adviser other products and services that may benefit Adviser but which may not benefit its clients. These types of services will help Adviser in managing and administering client accounts. These include software and other technology that provide access to client account data (i.e. trade confirmations and account statements); facilitate trade executions; provide research, pricing information, and other market data; facilitate in the payment of Adviser's fees from its clients' accounts; and assist with back-office functions, record-keeping, and client reporting. Many of these services may be used to service all or a substantial number of Adviser's accounts.

#### **Additional Compensation**

Advisor may receive research and execution related services from the parties mentioned to assist Advisor in managing its accounts. These services and products would include financial publications, pricing information and other products or services. Such research and execution related services are offered to all investment advisers who utilize these firms. However, the commissions charged by these parties may be higher than those charged by a broker who does not provide the aforementioned research and execution related services.

Please contact Dana Grigg, President and Chief Compliance Officer, if you have any questions about this narrative. Additional information about Camelotta is available on the Internet at "www.adviserinfo.sec.gov". You can search this site by a unique identifying number, known as a CRD number. The CRD number for Camelotta is 128053.