

# **Cammack LaRhette Advisors, LLC**

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## **FORM ADV PART 2A BROCHURE**

This brochure provides information about the qualifications and business practices of Cammack LaRhette Advisors, LLC. If you have any questions about the contents of this brochure, contact us at 646-839-8206. 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.

Additional information about Cammack LaRhette Advisors, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

Cammack LaRhette Advisors, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

## **Item 2 Material Changes**

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

Since the filing of our last annual updating amendment, dated March 19, 2019, we have no material changes to report.

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## **Item 4 Advisory Business**

Cammack LaRhette Advisors, LLC ("CLA"), was formed in April 2006 and is wholly owned by Charles W. Cammack Associates, Inc., which is in turn owned by Cammack Retirement Group Inc.

CLA is registered as a Pension Consultant investment advisor. CLA provides investment advisory, consulting services, and educational seminars/workshops to pension plans and their plan participants.

Any investment advice provided will be tailored to the Investment Policies of the plans. CLA may assist a plan in developing, modifying, and managing the investment policy for its clients. In addition CLA may also provide other types of plan consulting and review that do not involve providing investment advice.

CLA does not participate in any wrap fee programs.

CLA has approximately \$62,000,000 in discretionary assets under management and has approximately \$124,000,000,000 in assets under advisement as of December 31, 2019.

## **Item 5 Fees and Compensation**

CLA negotiates a fee for service for each customer. The annual fees applicable for plan services are fixed and billed quarterly or more frequently, in advance or arrears, at the preference of the client. An inflation adjustment increase may be billed after a time as specified in the client agreement. In addition to the annual service fees, CLA may charge plan clients as reimbursement for any reasonable out-of-pocket expenses incurred in providing the services which expense may include travel costs, printing, copying and postage or delivery charges. Fees are subject to change from time to time by mutual agreement of CLA and its clients.

### **Investment Advisory Fee Schedule**

CLA may provide Investment Advisory services to clients in addition to other services. The fee for investment advisory services is based upon the scope of services being provided. Advisory fees are payable quarterly, or monthly in arrears, or advance, based upon the client preference, and shall be determined in accordance with the corresponding fee schedule on the Client's Advisory Agreement.

Upon termination of any account, any prepaid, unearned fees, if applicable, will be promptly refunded, and any earned, unpaid fees will be due and payable.

Client agreements may be terminated by either party upon mutually agreeable written notice.

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

CLA does not accept performance-based fees.

## **Item 7 Types of Clients**

CLA provides investment advice to Pension Plans with a primary focus on defined contribution plans of corporations, non-profit organizations, state and municipal pension plans, and research organizations. We may also provide advice and or education to participants of these defined contribution plans if the plan sponsor elects this service.

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

We use Modern Portfolio Theory to guide our investment strategy. Our focus is to assist pension plans and individuals to develop a well-diversified portfolio and manage that array with appropriate time horizon changes. In providing this advice we use various sources of data from research materials provided by investment data providers, financial publications, fund information, and other public information sources.

We advise clients to invest for the long term and take risks they are comfortable with to achieve their objectives.

For Pension Plans we advise them to provide an array of investment choices to allow any of their employees the opportunity to develop a well-diversified portfolio that meets their individual investment needs, in keeping with Modern Portfolio Theory. We usually advise against providing more speculative investment options within the retirement plan.

We usually recommend well-known mutual funds.

Investing in securities involves a certain amount of risk of loss that clients should be prepared to bear. Questions regarding these risks may be directed to CLA and its management.

## **Item 9 Disciplinary Information**

CLA has not been involved in any legal or disciplinary events by any party, private or regulatory.

## **Item 10 Other Financial Industry Activities and Affiliations**

Cammack LaRhette Advisors, LLC is owned and affiliated with Charles W. Cammack Associates, Inc., (Insurance Agency), and affiliated with Cammack LaRhette Brokerage, Inc. (Broker Dealer). All three firms are wholly owned subsidiaries of Cammack Retirement Group, Inc.

Persons registered with CLA, may also be registered representatives of Cammack LaRhette Brokerage, Inc. (a Broker Dealer).

Cammack LaRhette Brokerage earns 12b-1 fees for certain clients of Cammack LaRhette Advisors for non-investment advisory account services provided to clients by Cammack LaRhette Advisors. Cammack LaRhette Advisors clients may also work with Charles W. Cammack Associates at the same time for non-investment advisory pension consulting services. These situations may raise conflict of interest concerns. To address these potential conflicts of interest, Cammack LaRhette Advisors does not collect or charge or receive any other fees or commissions in addition to the fees charged by the affiliated firms.

## **Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

As required by Rule 204A-1 of the Investment Advisers Act of 1940, CLA has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the firm. The Code of Ethics describes the firm's fiduciary duties and obligations to clients and sets forth the firm's practice of supervising the personal securities transactions of employees who maintain access to client information. CLA strives to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect our client's interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing. All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information.

CLA collects and maintains records of securities holdings and transactions made by employees. The firm reviews the personal trading practices of its employees to identify and resolve any potential or realized conflicts of interest.

CLA makes recommendations for its clients in the selection and retention of mutual funds investments. CLA and/or its representatives may purchase or sell investments for their personal accounts that they have similarly recommended to clients.

Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this brochure.

## **Item 12 Brokerage Practices**

CLA does not direct client transactions to a particular broker dealer in return for any compensation or consideration.

## **Item 13 Review of Accounts**

The internal investment team and committee conduct a quarterly review and analysis of investments held by our clients. The investment team is led by the Vice President of Investments. From this analysis, quarterly, semi-annual, or annual written reports are provided to clients as stated in their respective services agreement. Watch and/or replacement status of funds are governed by the Investment Policy of the plan and the prudent judgment of the investment team and the investment committee in their review.

## **Item 14 Client Referrals and Other Compensation**

CLA does not maintain any arrangements whereby the firm receives or pays compensation for client referrals.

## **Item 15 Custody**

CLA does not accept custody of client funds.

## **Item 16 Investment Discretion**

CLA may accept discretionary authority to direct or manage accounts of behalf of its customers. However, purchases or sales of securities may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by the firm.

Discretionary authority will only be authorized upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an agreement containing all applicable limitations to such authority. All discretionary trades made by CLA will be in accordance with each client's investment objectives and goals.

CLA will not have the authority to select the custodian or investment broker for these accounts.

## **Item 17 Voting Client Securities**

We do not have the authority to vote client securities. The client will receive all voting materials and information directly from the investment companies.

## **Item 18 Financial Information**

Neither CLA, nor its management, has any adverse financial situations that would reasonably impair the ability of CLA to meet all obligations to its Clients. Neither CLA, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. CLA is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.