

CHRISTY CAPITAL MANAGEMENT, INC.
CLIENT BROCHURE
ADV Form 2A

This brochure provides information about the qualifications and business practices of Christy Capital Management, Inc. If you have any questions about the contents of this brochure, please contact us at (478) 314-2160 or by email at: mark@christycapital.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.

Additional information about Christy Capital Management, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Christy Capital Management, Inc.'s CRD number is: 149313

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Registration does not imply a certain level of skill or training.

Version Date:
3/30/2011

ITEM 2: MATERIAL CHANGES

Christy Capital Management, Inc. has not yet filed an annual updating amendment using the ADV Form 2A. Therefore there are no material changes to report.

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ITEM 4: ADVISORY BUSINESS

A. Description of the Advisory Firm

Christy Capital Management, Inc. (hereinafter "CCM") has been in business since December 14, 2005, and the principal owner is Brandon Scott Christy.

B. Types of Advisory Services

CCM offers the following services to advisory clients:

Based on a client's individual circumstances and needs, CCM will recommend an appropriate investment program to the client. Factors considered in making this recommendation include account size, risk tolerance, the opinion of each client and CCM's investment philosophy. CCM will assist the client in reviewing the client's income and expenditures, investment objectives, risk tolerance, liquidity requirements, investment restrictions and other relevant factors.

INVESTMENT MANAGEMENT SERVICES

CCM offers a combination of the following advisory services, where appropriate, to individuals, high net worth individuals, pension and profit sharing plans, trusts, estates or charitable organizations and corporations or other business entities.

CCM provides continuous investment advice based on the clients individual objectives, needs, risk tolerance, and style of desired management, utilizing various security products, usually mutual funds. Such services are provided on either a discretionary or non-discretionary basis as specified in the Investment Policy Statement. The Investment Policy Statement consists of the Investment Management Agreement, Investment Advisory Agreement and the Personal Investment Profile.

INVESTMENT SUPERVISORY SERVICES

Supervisory Services

CCM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. CCM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Asset allocation
- Risk tolerance
- Personal investment policy
- Asset selection
- Regular portfolio monitoring

CCM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. CCM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

CCM will create a portfolio consisting of one or all of the following: individual equities, bonds, other investment products, and no-load, load-waived, and front-load mutual funds. CCM will allocate the client's assets among various investments taking into consideration the overall management style selected by the client. The mutual funds will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will

be determined by each client's individual needs and circumstances. Clients will have the opportunity to place reasonable restrictions on the types of investments which will be made on the client's behalf. Clients will retain individual ownership of all securities.

Unsupervised Assets

From time to time, advisory clients may have pre-existing investments that they do not want actively managed by CCM. These clients may request that CCM incorporate these holdings into a single account to facilitate future management and reporting. CCM will initially consolidate these unsupervised assets into a single account within the client's existing portfolio. These assets will not be actively managed by CCM although they will be incorporated into the client's quarterly summary reports prepared by CCM.

Selection of Other Advisors

CCM may direct clients to a third party money manager. CCM will be compensated via a fee share from the third party money manager to which it directs those clients. This relationship will be disclosed in each contract between CCM and the third party money manager. The fees shared will not exceed any limit imposed by any regulatory agency. Before selecting other advisors for clients, CCM will always ensure those other advisors are properly licensed or registered as investment advisors.

Services Limited to Specific Types of Investments

CCM limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, third party money managers, REITs, insurance products including annuities, and government securities. CCM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

CCM offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax rates, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and goals.

Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent CCM from properly servicing the client account, or if the restrictions would require CCM to deviate from its standard suite of services, CCM reserves the right to end the relationship.

D. Wrap Fee Programs

CCM does not participate in any wrap fee programs.

E. Amounts under Management

CCM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$14,100,000	\$0	03/24/2010

ITEM 5: FEES AND COMPENSATION

A. Fee Schedule

Investment Supervisory Services Fees

Total Assets Under Management	Annual Fee
First \$500,000	1.80%
Next \$500,000	1.40%
Next \$1,000,000	1.30%
Next \$2,000,000	1.10%
Above \$4,000,000	Negotiable

There is a minimum annual fee of \$400. These fees are negotiable and the final fee schedule is included in the Investment Management Agreement. Clients pay an annual percentage fee for any of the aforementioned Investment Management Services charged on a monthly basis in arrears based upon the average daily account balance of the account at the Average Daily Value of Client Account. For fees charged in arrears, no refund policy is necessary.

B. Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts with client written authorization. Fees are paid monthly or quarterly in arrears.

C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by CCM. Please see Item 12 of this brochure regarding broker/custodian.

The advisory fees paid to CCM represent fees for management of your account and are separate from any other fees and expenses charged by other parties; therefore, the fees shown in this ADV represent only the fees paid to us and do not reflect operating expenses and other costs charged by mutual funds or other investments and it is important you understand that these fees and expenses are ultimately borne by you, as the shareholder. Mutual funds and other investments may charge contingent deferred sales charges ("CDSC") or short-term redemption fees on withdrawals or redemptions. CCM is not responsible for any CDSC or short-term redemption fee charges incurred through the management of your account. A complete description of all fees and expenses are in the relevant prospectuses. CCM is also not responsible for any transaction costs incurred while managing your account. In addition, CCM advises you to carefully review the custody agreement between you and your custodian as there may be custodial fees charged to you for various services.

D. Prepayment of Fees

Advisory fees are paid monthly or quarterly in arrears, not in advance.

TERMINATION

CCM may terminate the agreement with you at any time by providing you with written notice. Likewise, you may terminate the agreement at any time by providing CCM with written notice. If the agreement is terminated within five (5) business days from the date of inception, all fees paid in advance will be refunded to you promptly. Should the agreement be terminated at any other time, you will receive a prorated refund of any prepaid fees. If you are billed in arrears for CCM's services, any outstanding amounts owed to CCM shall become immediately due and payable upon termination.

Upon termination of CCM's investment management services, CCM will have no obligation or authority to recommend or take any action with regard to the previously managed account. You are instructed not to send liquidation instructions along with your termination requests. If CCM receives a liquidation instruction along with a termination request, CCM will treat it solely as termination and you shall remain responsible for proper liquidation.

E. Outside Compensation for the Sale of Securities to Clients

CCM does not accept outside compensation for the sale of securities to a client.

I. Clients Have the Option to Purchase Recommended Products from Other Brokers

Clients always have the option to purchase CCM recommended products through other brokers or agents that are not affiliated with CCM. A client could invest in a mutual fund directly, without the services of CCM. In that case, the client would not receive the services provided by CCM which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

CCM does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

ITEM 7: TYPES OF CLIENTS

CCM generally provides investment advice and/or management supervisory services to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans
- Trusts, Estates, or Charitable Organizations

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF INVESTMENT LOSS

A. Methods of Analysis and Investment Strategies

Methods of Analysis

CCM's methods of analysis include fundamental analysis. Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Investment Strategies

CCM uses Long Term Trading strategies.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis

- I. Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Investment Strategies

- I. Long Term Trading is designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

CCM generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

ITEM 9: DISCIPLINARY INFORMATION

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither CCM nor its representatives are registered as a Broker/Dealer or Broker/Dealer Representative.

B. Registration as a Futures Commission Merchant (FCM), Commodity Pool Operator (CPO), or a Commodity Trading Advisor (CTA)

Neither CCM nor its representatives are registered as a FCM, CPO, or CTA.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Associated persons of CCM are insurance agents or brokers for one or more insurance companies. From time to time, they will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. CCM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of CCM in their capacity as an insurance agent.

D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

CCM may direct clients to a third party money manager. CCM will be compensated via a fee share from to which it directs those clients. This relationship will be disclosed in each contract between CCM and the third party money manager. The fees shared will not exceed any limit imposed by any regulatory agency. Before selecting other advisors for clients, CCM will always ensure those other advisors are properly licensed or registered as investment advisor. This creates a conflict of interest in that CCM has an incentive to direct clients to the third party money managers that provide CCM with a larger fee split. CCM will always act in the best interests of the client, including when determining which third party manager to recommend to clients.

ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. Code of Ethics

CCM has a written Compliance Policy Manual that covers the following areas: Management Oversight, Sanctions, Code of Ethics, Personal Trading Policy, Record Keeping Policy, Privacy Policy, Insider Trading Policy, Trading and Brokerage Policy, Portfolio Management, Proxy Voting Policy, Custody and Possession of Assets, Client Disclosures Policy and Communications Policy. Clients may request a copy of our Code of Ethics or Compliance Policy Manual from management.

B. Recommendations Involving Material Financial Interests

CCM does not recommend that clients buy or sell any security in which a related person to CCM has a material financial interest.

ITEM 12: BROKERAGE PRACTICES

A. Factors Used to Select Custodians and/or Broker/Dealers

For clients in need of brokerage or custodial services, and depending on client circumstances and needs, CCM may recommend the use of one of several broker dealers, provided CCM can meet its fiduciary obligation of best execution. CCM clients must evaluate these brokers before opening an account. The factors considered by CCM when making this recommendation are the broker's ability to provide professional services, CCM's experience with the broker, the broker's reputation, and the broker's quality of execution services and costs of such services, among other factors. Clients are not under any obligation to affect trades through any recommended broker.

CCM participates in the Huntington National Bank (HNB) and TD Ameritrade services programs. TD Ameritrade is sponsored by TD Ameritrade Institutional Services; a division of TD Ameritrade, Inc. 'TD Ameritrade' and TD Waterhouse are NASD registered broker dealers as a part of this program. CCM receives benefits that it would not receive if it did not offer investment advice.

1. Research and Other Soft-Dollar Benefits

CCM and/or its principal executive officers do not receive research or other soft-dollar benefits from a broker-dealer.

2. Brokerage for Client Referrals

CCM receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

As CCM does not have the discretionary authority to determine the broker dealer to be used or the commission rates to be paid, clients must direct CCM as to the broker dealer to be used. In directing the use of a particular broker/dealer, it should be understood that CCM will not have authority to negotiate commissions among various brokers or obtain volume discounts, and best execution may not be achieved. In addition, a disparity in commission charges may exist between the commissions charged to other clients.

For clients in need of brokerage or custodial services, and depending on client circumstances and needs, CCM may recommend the use of one of several broker dealers, provided CCM can meet its fiduciary obligation of best execution. CCM clients must evaluate these brokers before opening an account. The factors considered by CCM when making this recommendation are the broker's ability to provide professional services, CCM's experience with the broker, the broker's reputation, and the broker's quality of execution services and costs of such services, among other factors. Clients are not under any obligation to affect trades through any recommended broker.

ITEM 13: REVIEWS OF ACCOUNTS

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

CCM will provide reviews as contracted for at the inception of the advisory relationship. At least annually, individual clients are asked to meet with their Financial Advisor. Together, the client and the Financial Advisor determine whether a change in their objectives warrants a change in the criteria used to manage their account.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive, at least quarterly, a written report detailing the client's account which may be provided by the custodian.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

CCM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to CCM clients.

B. Compensation to Non-Advisory Personnel for Client Referrals

CCM does not provide compensation to non-advisory personnel for client referrals.

ITEM 15: CUSTODY

CCM does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the custodians; TD Ameritrade and HNB. Clients will receive account statements from the custodian and should carefully review those statements. CCM urges clients to compare the account statements they receive from the custodian with those they received from CCM.

ITEM 16: INVESTMENT DISCRETION

For discretionary clients, CCM requests that it be provided with written authority to determine which securities and the amounts of securities that are bought or sold.

Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing. This discretionary authority in no way restricts you from establishing special limitations on the types of investments CCM may recommend or make on your behalf and you may instruct CCM not to purchase. Imposing such restrictions may result in different performance results than those achieved by advisory clients who do not impose such restrictions.

Non-Discretionary Clients: An advisory client electing not to grant investment discretionary authority to CCM is advised that trades in his/her account may be executed subsequent to trades affected in discretionary accounts due to the additional time involved in obtaining the required client approval prior to executing any trade in such client's account. Consequently, there may be a difference in the price per share of a given security and the commission rates paid.

ITEM 17: VOTING CLIENT SECURITIES (PROXY VOTING)

CCM will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

ITEM 18: FINANCIAL INFORMATION

A. Balance Sheet

CCM does not require nor solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither CCM nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

CCM has not been the subject of a bankruptcy petition in the last ten years.

ITEM 19: Requirements for State-Registered Advisors

A. Principal executive officers and management persons

Brandon S. Christy is the President and Owner of the firm.

D. Mark Wilson is the Chief Operations Officer and serves as Secretary.

Mr. Christy and Mr. Wilson's formal education, business background and other business activity can be located in their individual brochure supplement (ADV Form 2B).