

MCKINNEY CAPITAL MANAGEMENT LLC
December 1, 2025

Item 1. Introduction.

McKinney Capital Management LLC is registered with the United States Securities and Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand the differences.

Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers and investing.

Item 2: What investment services and advice can you provide to me?

McKinney Capital Management provides investment management services to retail investors. We tailor your investment management services to match the investment objectives, financial needs, and other information which you provide to us. We monitor the holdings and performance of your investment management services account on an ongoing basis. We provide investment management services on a discretionary basis pursuant to authority granted to us in your client agreement. Pursuant to this discretionary authority we are authorized to determine which securities are bought and sold, the total amount to be bought and sold, and the costs at which transactions will be affected. However, there are certain clients for which we provide investment management services on a non-discretionary basis. When receiving non-discretionary investment management services, you make the ultimate decision regarding the purchase or sale of investments recommended by us. We generally do not limit the types of investments we utilize for clients. We utilize registered mutual funds, exchange traded funds (ETFs), equity securities, corporate bonds, REITS, variable annuities, private funds/alternative investments, closed end funds, structured notes and options, if we determine such investments fit within a client's objectives and are in the best interest of the client. We do not impose account minimums for new clients. Regardless, we reserve the right to accept or decline a potential client for any reason in our sole discretion.

For additional information, please refer to our [Form ADV Part 2A Brochure](#), especially [Item 4 Advisory Business](#) and [Item 7 Types of Clients](#).

Questions to Ask Us:

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose the investments that you recommend to me?

*What is your relevant experience, including your licenses, education and other qualifications?
What do these qualifications mean?*

Item 3 (part 1): What fees will I pay?

For investment management services we charge an asset based fee, which is billed on a monthly basis. For an asset based fee, the more assets that are in a client's advisory account, the more a client will pay in fees. Therefore, we may have an incentive to encourage clients to increase the assets in his or her account.

In addition to our fees you will be responsible for other fees and expenses, such as, transaction charges and fees/expenses charged by any custodian of your account, subadvisor, mutual fund, exchange traded fund, separate account manager and any taxes or fees required by federal or state law.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For additional information, see [Item 5 Fees and Compensation](#) of our [Form ADV Part 2A Brochure](#).

Question to Ask Us:

Help me to understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

Item 3 (part 2): What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide to you. Here are some examples to help you understand what this means. For instance, we receive various benefits and services from the custodian that we recommend to you. For additional information, please refer to our [Form ADV Part 2A Brochure](#), specifically [Item 12 Brokerage Practices](#).

Question to Ask Us:

How might your conflicts of interest affect me, and how will you address them?

Item 3 (part 3): How do your financial professionals make money?

Our financial professionals are paid pursuant to participation in firm profits as owners of the firm. Financial professionals compensated pursuant to their ownership in the firm are subject to a conflict of interest due to the fact increases in firm or client account revenue may lead to increased firm profits. Certain of our financial professionals serve as registered representatives of an unaffiliated broker-dealer. In addition, certain of our financial professionals are licensed insurance agents and in that capacity may recommend the purchase of certain insurance products to our clients. These financial professionals earn commissions and other fees on products sold through the unaffiliated broker-dealer or otherwise in their capacity as insurance agents. While no commissions are earned by these financial professionals relative to any of our client investment management services accounts, this presents a conflict of interest because these financial professionals in their role as registered representatives for the unaffiliated broker-dealer or as licensed insurance agents are incentivized to make recommendations based on the compensation received rather than on a client's needs. For additional information regarding our financial professionals' activities as registered representatives of an unaffiliated broker-dealer and insurance agents please refer to our [Form ADV Part 2A Brochure](#), specifically [Item 10 Other Financial Industry Activities and Affiliations](#).

Item 4: Do you or your financial professionals have a legal or disciplinary history?

No. You can visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Questions to Ask Us:

As a financial professional, do you have any disciplinary history? For what type of conduct?

Item 5: Additional Information

For additional information about our investment advisory services and to request a copy of our Form CRS, please contact us at 713-888-0841.

Questions to Ask Us:

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how a person is treating me?