

# KEMP Financial Management, LLC



ADV II A - Update Dated March 28, 2018

This Brochure provides information about the qualifications and business practices of Kemp Financial Management. If you have any questions about the contents of this Brochure, please contact us at the number below. Our Brochure is also available on our web site [www.kempfm.com](http://www.kempfm.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 Robert Kemp is also available via the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with Robert Kemp who are registered, or are required to be registered, as investment adviser representatives of Kemp Financial Management.

Robert Kemp is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

2286 N. State College Blvd. Fullerton, CA 92831  
(714)257-0800 [www.kempfm.com](http://www.kempfm.com)

## **Item 2 – Material Changes**

Our last ADV Annual Update was dated March 1, 2017. We amended our ADV on October 17, 2017. This amendment was in reference to our terminating our relationship with our Broker/Dealer, SagePoint Financial, Inc. Robert J Kemp was a Registered Representative of SagePoint Financial, Inc. until September 30, 2017. Melissa L Clarke was a Registered Assistant with SagePoint Financial, Inc. until September 30, 2017.

There have been no other material changes to this brochure since the prior update.

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## **Item 4 – Advisory Business**

Kemp Financial Management, LLC. (Kemp Financial) is a Registered Investment Advisory firm that has provided Investment Advisory services since 1996. The owner of and principal investment advisor representative for Kemp Financial is Robert J. Kemp. Kemp Financial has been in business since 1988 and has approximately \$144 million in non-discretionary regulatory assets under management as of December 31, 2017.

At Kemp Financial Management, LLC our mission is to provide our clients with greater investment success through the application of proven investment strategies that ultimately lead to financial independence, security, and peace of mind. Our intent is to understand our client's current financial situation and to provide investment solutions that are consistent with their stated goals and risk tolerance.

Kemp Financial provides complete, personalized advice so that our clients can make solid, well-informed decisions about their investments and retirement plans. Our strategies are based on the concepts of the Nobel Prize-winning Modern Portfolio Theory, which identifies the most efficient combination of assets to establish a growth or income portfolio that preserves those assets with a risk level appropriate for each individual investor. Once the asset mix has been determined, Kemp Financial recommends one or more third party money managers to help implement the allocation strategy. The firm does not manage assets on a discretionary basis. While Kemp Financials goal is to help our clients achieve investment success, we offer no guarantee that our advice will result in profit or protection from loss.

All of our clients come to the firm through introductions from existing clients or from relationships with other professional like Certified Public Accountants, Estate Planning Attorneys and Insurance Professionals. When Kemp Financial Management receives introductions from other financial professionals, there is no compensation or "referral fee" paid to those professionals and they do not participate and share in any revenue from Kemp Financial Management, LLC. Kemp Financial Services provides a number of other services, usually in conjunction with our advisory services discussed above. We often coordinate with attorneys, insurance representatives and accountants to help our clients with various aspects of financial and estate planning. We have no attorneys or accountants on staff, so we do not provide either legal or tax advice, but we are happy to work with our clients' attorneys and accountants, and we do so periodically.

Kemp Financial concentrates on asset class allocation and provides continuous investment supervision of client assets based on individual client needs. In some cases, clients may

determine to hold some of their existing holdings due to tax consequences and the holdings will be used as part of the asset allocation model.

The details of how a specific client's account will be managed are set forth in the client's investment advisory agreement and other account opening documentation. In general, the accounts are managed in accordance with the client's individual needs, risk tolerance, objectives and reasonable investment restrictions by purchasing and/or selling securities.

Kemp Financial may recommend that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a FINRA-registered broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although Kemp Financial may recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Kemp Financial is independently owned and operated and not affiliated with Schwab.

Schwab provides Kemp Financial with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets are maintained in accounts at Schwab Institutional. These services are not contingent upon Kemp Financial committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, 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 Kemp Financial client accounts maintained in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Kemp Financial reserves the right to open custodial accounts with other firm approved custodians should the need arise.

### **Selection, Recommendation, Due Diligence and Performance Appraisal of Third Party Investment Advisory Services**

Adviser has entered into agreements with various Third Party investment advisers ("Third Party Advisory Service") for the provision of certain investment advisory services.

Adviser's Advisory Representatives will provide personal advisory services to their Clients in the selection of a particular Third Party Advisory Service. Factors considered in the

selection of a Third Party Advisory Service include but may not be limited to: i) each individual Advisory Representative's preference for a particular Third Party Advisory Service; ii) the Client's risk tolerance, goals and objectives, as well as investment experience; and, iii) the size of Client assets available for investment. All securities transactions will be decided upon and executed by the Third Party Advisory Service.

In order to assist in the selection of a Third Party Advisory Service, the Advisory Representative will typically gather information from the Client about the Client's financial situation, investment objectives, and reasonable restrictions the Client wants imposed on the management of the account.

### **Ongoing Performance Monitoring and Appraisal of Selected Third Party Advisory Services**

Adviser's Advisory Representatives will periodically review reports provided to the Client. An Advisory Representative will contact the Client periodically, as agreed upon with each Client, to review the Client's financial situation and objectives, communicate information to the Third Party Advisory Service managing the account as warranted, and to assist the Client in understanding and evaluating the services provided by the Third Party Advisory Service. Clients will be expected to notify their Advisory Representative of any changes in their financial situation, investment objectives, or account restrictions. Clients may also directly contact the Third Party Advisory Service managing the account or sponsoring the program.

### **Additional Information Concerning Third Party Advisory Services**

Please Note: When investing in mutual funds and variable annuities, Clients are strongly encouraged to review the applicable prospectus. Mutual funds and variable annuities may impose certain restrictions on the frequency, timing and dollar amount of transactions and may impose penalty fees based upon short-term trading patterns. Such restrictions may impact the services provided by a Third Party Advisory Service.

A complete description of the programs and services available through Third Party Advisory Services will be provided to Clients upon receipt and review of the applicable Third Party Advisory Service's Form ADV and/or Brochure; investment advisory contracts; and account opening documents.

### **Third Party Advisory Service Compensation**

Compensation generally, consists of four elements: i) management and advisory fees; ii) transaction costs – if applicable – which may be paid to purchase and sell such securities;

iii) custody fees; and iv) an additional Administrative fee paid to “sponsor” for its supervisory services.

Such compensation, in turn, is recaptured through the following pricing structure:

### Unbundled Pricing

Third Party Advisory Services are billed separate from the advisory fee charged by KFM. When client accounts are billed, the fees will be assessed and will identify the advisor’s fee and the “sponsor” or “administrator” fee. Both fees will be deducted from the client accounts at the beginning of the calendar quarter. Transaction costs may also be charged for the execution and clearance of advisory transactions by the Custodian. Neither the “sponsor” nor the advisor share in those fees.

Clients will receive an account statement from the Third Party Advisory Service at least quarterly, which includes the amount of any fees paid directly to such Third Party Advisory Service, or any other adviser selected by the Client to manage the account. These fees are in addition to the internal advisory fees and expenses paid by the mutual funds or variable annuity companies to their separate investment advisers. In addition, variable annuity companies generally impose mortality charges on such accounts, of approximately 1.25% annually. We encourage all clients to read the prospectus for each recommended fund for a detailed analysis of all the applicable fees and charges for each mutual fund or ETF (if applicable).

The amount of total fees, the services provided, the payment structure, termination provisions and other aspects of each program are detailed and disclosed in: i) the Third Party Investment Advisory Service’s Form ADV Part II; ii) the disclosure documents of the portfolio manager or managers selected; or, iii) the Third Party Advisory Service’s account opening documents.

Working with ICON (Legacy Accounts – New Accounts have not been opened since 2000) Adviser will not be paid fees through a direct contract with the Client, but will receive a portion of the Client’s advisory fee as a solicitor in accordance with Rule 206(4)-3 promulgated by the Securities and Exchange Commission pursuant to the Investment Advisers Act of 1940.

Please note that the same or similar services may be available elsewhere at a lower cost to the Client.

### **Engaging a Third Party Investment Adviser**

The Client will sign an advisory agreement or contract directly with the sponsor/adviser of the Third Party Advisory Service selected and Kemp Financial Management. The advisory

relationship may be terminated by the Client or by third parties to the contract in accordance with the provisions of the program contract. The Client will typically receive a pro rata refund of any prepaid advisory fees. Additionally, a Client may terminate an advisory contract without being assessed any fees or expenses within (5) business days of its signing.

There is no guarantee that the advisory services offered will result in the Client's goals and objectives being met. Nor is there any guarantee of profit or protection from loss. The fees and expenses paid by the Client in connection with Third Party Advisory Service may be higher than the cost of similar services offered through other financial firms or the fees associated with other financial services. No assumption can be made that any particular fee arrangement, timing services or portfolio management services of any nature will provide better returns than other investment strategies.

### **Consulting Services**

The principals and associated persons of the applicant are licensed as Insurance Agents (1%) and California Real Estate Brokers (0%) with the time spent represented by the percentage indicated next to each activity. Robert Kemp is currently a Trustee for the Marshall B. Ketchum University (2%).

### **Item 5 - Fees and Compensation**

Kemp Financial charges its fees in advance and billed quarterly thereafter based upon the value of the account at the close of each quarter. For new accounts quarterly fees are prorated and paid at the time the management activity begins. Clients receive a refund for advanced management fees prorated to the date of termination upon closing of an account.

Management fees generally range from .5% to 1.35%, depending on the size of the account and the services covered. The amount of the fees, the services provided, the payment structure, termination provisions, and other aspects of each program are detailed in the third party manager's form ADV Part II and management agreement. Some Third Party Managers will charge additional administrative charges above and beyond fees charged by Kemp Financial Management and custodial trading costs. Any additional costs are fully disclosed to the client and approved by the client in the Third Party Manager Management agreement. In some cases, Kemp Financial Management, LLC may recommend the use of mutual funds in which the Third Party Manager of "sponsor" receives a portion of the fees charged by the mutual fund. These charges and related fees are fully disclosed in the mutual fund prospectus and Third Party Manager Management agreement. Under no circumstances does Kemp Financial Management share in the additional administrative

fees charged by the Third Party Managers nor do they receive any fees from the mutual funds used by the Third Party Manager or “sponsor”.

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

Kemp Financial Management, LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

Kemp Financial Management has the following types of clients:

- Individuals who have personal investment or retirement accounts such as IRAs.
- Business owners who maintain investment accounts for the company or act as plan administrators for their company retirement and pension plans.
- Trustees who administer personal trusts for themselves, for their families, for an estate or for a charitable trust.
- Charitable Organizations that maintain endowment accounts or charitable accounts.

### ***Account Requirements***

The minimum account size for a client of Kemp Financial Management is typically \$1,000,000. We may make, at our discretion, exceptions to this based on a variety of factors. These factors include, but are not limited to, considerations such as growth potential, relationship of a potential client to us or to a current client, and the type of client.

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

Investing in securities involves risk of loss that clients should be prepared to bear.

Kemp Financial closely follows the asset allocation strategies developed by Nobel Prize Winners, Harry Markowitz and Bill Sharpe. In general, these strategies demand a long-term perspective of a minimum 5 to 10 years. The analysis of asset classes includes the development of average historical rates of return, standard deviation and correlation coefficients between the asset classes. An asset mix is developed that fits the client’s respective risk tolerance, time horizon and income needs as determined by the client.

Advisory Representatives may utilize computer software programs provided by such third-party advisers in providing this advice to Clients. Most transactions and recommendations are long-term in nature, however from time to time short-term trades may be placed on

behalf of clients if the need arises. As a general rule, Kemp Financial does not advocate or use margin on behalf of their clients. However, margin may be used to satisfy short-term need strictly based upon the client's needs. Margin can and will only be used at the express authorization of the client and clients will incur the added expense to the cost of margin.

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Kemp Financial Management, LLC or the integrity of Kemp Financial Management, LLC's management. Kemp Financial Management, LLC has no information applicable to this Item.

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

The applicant is not involved in other activities during normal business hours. But principals and associated persons of the applicant are licensed as Insurance Agents (1%) and California Real Estate Brokers (0%). Robert Kemp is currently a Trustee for the Marshall B. Ketchum University (2%).

The Adviser is committed to safeguarding the confidential information of its Clients. The Adviser holds all personal information provided to the Firm in the strictest confidence. These records include all personal information that the Adviser collects from its Clients or receives from other firms in connection with any of the financial services it provides. The Adviser also requires other firms with whom its deals to restrict the use of Clients information. The Adviser's Privacy Policy is available upon Client's engagement of the Adviser's services or by prior request of the Clients.

### **Additional Compensation**

Rule 203-1 under the Investment Advisers Act of 1940 requires that if an investment adviser or related person could be eligible to receive incentive awards this must be disclosed in a statement to the effect that the receipt or potential to receive non-cash incentives may affect your judgment in selecting products sold to your clients. The advisors at Kemp Financial Management do not participate in award or incentive programs.

Kemp Financial or affiliates may refer clients to Loring Ward, Inc. for advisory services. Kemp Financial may recommend clients purchase one or more of the SA Funds, which are managed and administered by LWI and/or engage LWI as a portfolio administrator. Kemp Financial may also recommend clients purchase one or more of the DFA Funds, which are administered by Loring Ward. From time to time, Kemp Financial may also offer other

funds that will fit the client's needs. Kemp Financial has a conflict of interest in making these recommendations, because Kemp Financial may receive reimbursement of certain marketing expenses and or hold joint educational workshops with LWI. However, Kemp Financial is subject to and intends to comply fully with standards of fiduciary duty that require that it act in the best interests of a client when making investment recommendations. A copy of LWI's ADV Part II is provided to all clients that are referred to LWI. If you would like to receive a copy of LWI ADV Part II contact LWI at (800) 366-7266 or write to LWI address of record.

In addition, there are also services custodians provide to us that do not help our clients directly but are intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefit providers, human capital consultants, and insurance providers

The availability of these Institutional Services free of charge from custodians benefits us, but creates a conflict of interest in that we have an incentive to direct our clients towards the particular brokerages that we receive these benefits from rather than a brokerage that might provide the most favorable execution. We believe that the execution methods and pricing obtained from our recommended custodians is very competitive and that the benefits our clients receive from the provided services outweigh the benefits of getting the least expensive trade.

## **Item 11 – Code of Ethics**

### ***Code of Ethics***

An employee or adviser of Kemp Financial will place the needs and best interests of our clients above the needs and interests of themselves or business associates in all cases, and will not allow the pursuit of financial gain or other personal benefit to interfere with the exercise of sound professional judgment and skills. A complete copy of our code of ethics is available upon request.

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

At times the interest of the accounts belonging to the owner and employees of Kemp Financial may correspond with client interests. At no time do any of these corresponding interests represent a material interest in the security involved.

Kemp Financial obtains information from a wide variety of public sources and has no direct sources of inside or private information. In the event that a conflict of interest arises that has significant financial implications to our clients, we will fully disclose it. All rules and regulations of the Investment Advisers Act of 1940 will be strictly enforced. Kemp Financial will maintain personal transaction records and will not permit insider trading.

### ***Personal Trading***

From time to time, the owners and employees of Kemp Financial invest in the same securities that Kemp Financial recommends to our clients and that clients hold in their accounts. This can be considered a conflict of interest in that we may have an incentive (our own investment) to encourage our clients to invest in a particular security; however, the securities we recommend to our clients are almost always mutual funds and are always large enough and liquid enough that neither our nor our clients' transactions can materially affect the price of the security. It is also possible that Kemp Financial or an employee of Kemp Financial could be buying or selling securities for our own accounts about the same time as the same securities are bought and sold for our clients. To avoid conflicts of interest here, neither Kemp Financial nor its employees may trade in advance of our clients' trades. In addition, neither Kemp Financial nor its employees will take an opposite position to one recommended to a client.

### **Item 12 – Brokerage Practices**

Kemp Financial Management does not receive or use any soft dollar benefits. Neither Kemp Financial, its associated persons, nor unaffiliated investment advisory or financial planning entities with which Kemp Financial may have agreements, directly suggest brokers to Clients, unless done in conjunction with an investment management program(s). The client is always free to utilize their broker of choice in implementing the advice or financial plan.

### **Item 13 – Review of Accounts**

There are two levels of review for our client portfolios. The third party managers review the accounts on a quarterly basis to determine whether or not the investment portfolios are allocated appropriately to the model selected by the client and the advisor. In the event the portfolio is out of alignment to the model, a report would be generated for the advisor to review the appropriateness of “rebalancing” the account to the model.

In addition, client accounts are reviewed by the financial advisor and client on a schedule determined by the needs of the client. The schedules vary by the need of the client on a 3-4

month or bi-annual basis, but the meetings are never less than annual, unless waived by the client.

The advisors at Kemp Financial Management, LLC are available in between update meetings to meet with the clients in the event of a change in their financial situation. All meetings include discussions on client objectives, needs and financial situations. All client meetings are held on irregular intervals throughout the calendar year.

Some custodians provide confirmation statements upon the execution of all trades. All custodians provide monthly or quarterly statements reflecting any trading activity for the period, along with an accounting of inflow and outflows of cash and securities. In addition, the monthly or quarterly statements include a monthly and annual progress report and account valuation for the beginning and closing of the month or quarter.

The third party managers provide each client with a detailed quarterly report, including valuations on the last business day of the calendar quarter. Each quarterly report provides a detailed performance calculation along with an invoice calculating the appropriate management fees for the quarter. In the event the client maintains taxable accounts, the third party managers provide comprehensive cost basis information to supplement any tax forms sent to the clients from their respective custodian at the conclusion of each calendar year.

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

Kemp Financial Management does not receive any compensation from non-clients for providing advisory services to clients. No compensations is given or received to any persons who provide client referrals.

#### **Item 15 – *Custody***

Clients will receive at least quarterly statements from the qualified custodian that holds and maintains client's investment assets. Kemp Financial Management, LLC urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Statements from third party managers may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

At no time will Kemp Financial accept full custody of client funds or securities in the capacity of a custodial broker-dealer, and at all times client accounts will be held by a third-party qualified custodian.

## **Item 16 – Investment Discretion**

Kemp Financial Management, LLC does not have discretionary authority from the client. Should a client grant discretionary authority to the Advisor, a separate written agreement between the client and Advisor must be in place prior to implementation.

When selecting securities and determining amounts, Kemp Financial Management, LLC observes the investment policies, limitations and restrictions of the clients for which it advises.

Investment guidelines and restrictions placed by clients must be provided to Kemp Financial Management, LLC in writing.

## **Item 17 – Voting *Client* Securities**

Kemp Financial does not vote proxies for clients. Most clients do not have individual stock holdings in their accounts, but for those who do, the proxy statements will be mailed by the account custodian directly to the client at the address the custodian has on file.

## **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Kemp Financial Management, LLC's financial condition. Kemp Financial Management, LLC has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

# KEMP Financial Management, LLC



ADV II B - Update Dated March 28, 2018

This Brochure Supplement provides information about Robert Kemp that supplements the Kemp Financial ADV Part 2 Brochure. Please contact Lissa Clarke at 714-257-0800 or by e-mail at [Lclarke@kempfm.com](mailto:Lclarke@kempfm.com) if you did not receive Kemp Financial Management LLC's Brochure or if you have any questions about the contents of this supplement. This document can also be located on our website at [www.kempfm.com](http://www.kempfm.com).

**Additional information about Robert Kemp is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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(714)257-0800 [www.kempfm.com](http://www.kempfm.com)

## **Item 2- Educational Background and Business Experience**

**Robert J. Kemp** born 1965

Post-Secondary Education:

California State University at Fullerton, Fullerton, CA B.S. Political Science, 1987

Business Background:

09/96 to Present Financial Adviser, Kemp Financial Management, LLC, Fullerton, CA  
11/98 to 09/17 Branch Manager and Reg. Representative, SagePoint Financial Advisors, Inc.  
Phoenix, AZ  
02/93 to 11/98 Branch Manager and Reg. Representative, United Pacific Securities, Inc.  
Carlsbad, CA  
10/91 to 09/96 Financial Adviser, Kemp Cooke Redmond, Fullerton, CA  
09/88 to 02/93 Registered Representative, Titan Value Equities, Tustin, CA  
06/88 to 09/88 Registered Representative, Value Equities Corp, San Diego, CA  
08/85 to 10/91 Financial Adviser, Kemp Cooke, Inc. Anaheim, CA  
07/88 to 09/17 Series 7 General Securities Representative  
05/91 to 09/17 Series 24 General Securities Principal  
02/94 to Present Series 63 Uniform Securities Agent State Law Exam  
12/02 to Present Series 66 Uniform Combined State Law Exam

## **Item 3- Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any person providing investment advice. No information is applicable to this Item.

## **Item 4- Other Business Activities**

I participate in quarterly board meetings as a trustee and board member for the Marshall B. Ketchum University. This is a board made up of 21 entrepreneurs, reviewing the financial condition of the school and providing guidance to the President of the School. I also serve as a member of the Finance Committee providing guidance to the board relating to financial matters of the University. No compensation is received for being a trustee and board member for the Marshall B. Ketchum University.

I am licensed as a California Life and Casualty insurance agent. I review insurance needs for our clients as part of our advisory business.

I am currently licensed as a California Real Estate Broker known as Kemp Realty. I currently buy and sell Real Estate for my own personal benefit. All client real estate transactions are handled by licensed real estate agents and brokers non-affiliated with Kemp Financial Management, LLC. No compensation is received or shared with any other real estate agents or brokers.

### **Item 5- Additional Compensation**

Robert J. Kemp does not receive any additional compensation from any outside business activities, mutual funds, publicly traded companies, custodians, banks, CPA's, Attorney's, referrals or professional organizations.

### **Item 6 – Supervision**

Robert J. Kemp is the Chief Compliance Officer at Kemp Financial Management, LLC and has the responsibility of supervision over all of the investment advisory activities within the firm.

### **Item 7- Requirements for State-Registered Advisers**

Robert J. Kemp is registered in the State of California and Arizona. Many of the firm's clients reside outside the State of California. Prior to working with clients in States outside of California, the firm reviews the registration policy of each State. Each State has its own requirements and when necessary, Mr. Kemp will register himself as an investment advisor in that State. As a general rule, most States have a "De Minimis" requirement, which allows for 5 or fewer clients to reside in that State and/or not having an office within that State to avoid registration. The rules and regulations of each State are reviewed regularly to ensure proper registration as needed.

### **Disclosures**

Certain Third Party Advisory Service Programs ("Advisory Service Programs") that I may offer you, provide me with the opportunity to attend training or education conferences. Such conferences include lodging, meals and education for attendees. Further, if I highlight the products or services of certain Advisory Service Programs during seminars or presentations that I compose, I may be entitled to advertising or marketing expense reimbursement.

My custodian may offer me software and technology that assist in the management and administration of your account and a mix of services to manage and further develop my business.

As outlined above, the benefits that I receive may provide me with an incentive to put my interests before your best interests.