

Item 1 – Cover Page



KCM Investment Advisors LLC

Form ADV: Part II

January 19, 2018

This Form ADV, Part II constitutes KCM Investment Advisors LLC (hereinafter sometimes KCM) information brochure regarding the advisory services, qualifications and business practices we offer and provide to clients. It describes our services and many of the practices we use in connection with managing portfolios.

If you have any questions about the contents of this brochure, please contact us at (415) 461-7788 or visit our website at www.KCMAdvisors.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.

Updated Effective: January 18, 2018

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Item 2 – Material Changes

In the future, this Item will discuss only specific material changes that are made to the brochure and provide clients with a summary of such changes. KCM will also reference the date of its last annual update of this brochure. In the past KCM has offered or delivered information about its qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC rules, KCM will ensure that you immediately receive a summary of any material changes.

Currently, KCM's ADV Parts I & II may be requested by contacting Mary Coyne or Ray Randolph @ (415) 461-7788 or via email to info@KCMAdvisors.com. Additional information about KCM is also available via the SEC's web site www.adviserinfo.sec.gov and at www.kcmadvisors.com.

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Item 4 – Advisory Business

KCM Investment Advisors LLC (“KCM”) is a San Francisco Bay Area based Registered Investment Adviser offering a variety of portfolio solutions. KCM is 100% privately held and has no outside ownership. We began managing domestic equity and fixed income accounts in 1996 and now serve a diverse range of clients including high net-worth individuals and families, pensions, corporate, foundations, and endowments from coast to coast.

KCM provides “investment supervisory services” to its clients. These supervisory services primarily consist of the following activities:

- Creation and management of customized, and structured portfolios based upon the client’s investment objectives and restrictions;
- Periodic re-balancing of accounts managed by KCM consistent with the account’s investment objectives and restrictions;
- Implementation of the investment strategies by executing portfolio transactions as needed; and
- Furnishing client reports concerning separate account activity, strategy and performance.

While many clients come to KCM looking for one particular strategy, most individual accounts have chosen to custom tailor their accounts with a customized combination of high quality equities, investment quality fixed income, preferred stocks and exchange traded fund (ETFs), as well as open and closed-end mutual funds.

Allocations

Policy Summary: In general, investment decisions for each client (or group of clients with a similar investment objective) are made independently from those of other client accounts and are made with specific reference to the individual needs and objectives of each account (or group of accounts). Because investment decisions frequently affect more than one account, and sometimes more than one group of accounts, it is inevitable that at times it will be desirable to acquire or dispose of the same security for more than one client account at the same time.

KCM personnel are fiduciaries to each of their clients. As such, personnel owes each client the duty of loyalty. No client is owed a greater or lesser degree of fiduciary loyalty and therefore, no client or group of clients may be given preferential treatment in connection with investment opportunities. KCM aggregation and allocation policy is designed to equitably aggregate buy and sell executions among clients when feasible and appropriate over time consistent with providing best execution and to allocate such block trades to eligible client accounts in a fair and equitable manner.

EQUITY INVESTMENT ALLOCATION

- The Portfolio Manager is the responsible member of the investment team that must review and approve buy/sell orders before execution based on security suitability, cash positions, investment mandates and other account restrictions and characteristics.
- Equity orders are input in the Order Management System by authorized personnel. The execution of the order is the responsibility of the authorized traders within the Equity area consistent with seeking best execution. Additional orders for the same security should be added to the remaining portion of the original trade that is yet to be completed and the OMS creates an average price for the day.
- In situations where clients direct or restrict all brokerage for their accounts, KCM may be unable to obtain best execution for such trades. Such clients are informed of the potential issues related to the limits their instructions put on the timing of trades, expenses and potential execution, as noted in Form ADV.
- Where clients have directed brokerage for their account and maintain that KCM remains subject to best execution, KCM traders use their professional judgment, consistent with their best execution responsibility, to decide whether to combine those trades along with trades for other client accounts or to execute a portion of the trade with the directed broker. Clients are informed of the potential issues related to the limits their instructions put on timing of trades, expenses and potential execution, as noted in Form ADV, Part II.
- In the event of a request to change the initial allocation of trades, the reallocation must be documented in a written statement regarding the reason for the change in the allocation of an error along with a signature from the COO or one member of management committee. Any reallocation ordinarily would be completed no later than one day after the date of trade. Reallocation of trades is subject to the Trade Error policy.

Trade Allocation Procedures:

The following procedures are used to allocate orders:

- If the entire order is completed in one day, all accounts that participate in a block transaction will participate using an average price (including any transaction costs).
- If an order is partially completed in a single day's trading, client orders are filled using a random allocation function in the Order Management System.

FIXED INCOME INVESTMENT

Procedures:

- Authorized individuals must review and approve buy/sell orders before execution based on security suitability, cash positions, investment mandates and other account restrictions and characteristics.
- Fixed Income orders are documented on allocation spreadsheets and statements. The aggregation and allocation procedure is not documented in the trade system.
- Once orders are approved, the execution of the order is generally the responsibility of the fixed income trader.
- As a general rule, all contemporaneous client trades in the same security for accounts under the management of the same portfolio manager(s) or same management team will be combined in a single order if the terms are the same, unless a client has expressly prohibited combining orders with other accounts.
- In the event of a request to change the initial allocation of trades, the reallocation must be documented in a written statement regarding the reason for the change in the allocation of an error along with a signature from the CCO or one member of management team. Ordinarily, any reallocation should be completed no later than the next trading day.

Fixed Income Trade Allocation Procedures:

- As a general rule the Fixed Income Team shall allocate all fixed income securities in a fair and equitable manner taking into account that such securities may be available in limited quantities that preclude pro-rata allocation and the fact that other fixed income securities of equal quality and yield may be suitable substitutes. Position sizes are generally rounded off to portfolio appropriate sizes due to the nature of limited trading within the fixed income securities, and to allow each account to maximize their independent liquidity. Ordinarily, there are two allocation methodologies used for fixed income securities.
- Appropriate Exposure to Risk-Absent other factors, all trades in a security will be aggregated and allocated in a manner consistent with the equalization of all accounts with similar risk profiles relative exposure to their target position in a specific risk (such as issuer, industry, yield, duration). Where accounts are more or less risk tolerant, or have more or less of a similar security, trade allocations are adjusted accordingly.
- Pro-Rata Total Market Value-While not violating the above, this methodology may be used when two or more accounts seek exposure to a particular CUSIP with limited availability. Under this methodology, all accounts participating in a transaction for the CUSIP shall have a portion of the order allocated to them

on a roughly pro-rata basis relative to their respective market values if and when appropriate.

Allocation methodologies may be modified when strict adherence to the usual allocation method is impractical or leads to inefficient or undesirable results. This is usually the result of a smaller than desired or expected trade execution. The decisions should be made in advance of the trade execution when feasible, but often are done at the time of execution on fair and equitable, but not necessarily equal, treatment of accounts. Examples of such instances are as follows:

- When the fixed income team determines that it would be appropriate to fill a group of accounts with similar portfolio objectives prior to moving to accounts with less suitability for the particular bond. As an example, if a limited amount of a security rated "A" is purchased, the investment grade only accounts may be given priority over Core Plus accounts with more alternatives available.
- When the fixed income team determines that it would be inappropriate to allocate particularly small odd-lot positions, or a pro rata allocation allocates too little for an account to maintain a position.
- In the event of a request to change the initial allocation of trades, the reallocation must be documented in a written statement regarding the reason for the change in the allocation of an error along with a signature from the CCO or one member of management committee. Ordinarily, any reallocation should be completed no later than the next trading day.

Annually these policies and procedures will be reviewed to ensure that they are adequate to prevent any client from being systematically disadvantaged as a result of the aggregation or allocation process.

As of December 31, 2017 KCM manages \$4.1 billion in client assets, all on a discretionary basis (see discussion on "Un-Managed Holdings Item 19" herein).

Investment Manager Education Background and Business Experience

JAY A. KELLETT

Mr. Kellett was born in 1945, and serves as KCM's acting CEO and CIO. Jay received a BS degree from the University of Wisconsin at Madison, where he also attended the Graduate School of Business and Finance. In January of 1970, Mr. Kellett joined Smith Barney & Co. in the corporate bond department in New York and was transferred to San Francisco as a member of the institutional fixed income department. In 1981, Mr. Kellett joined Merrill Lynch as a Sr. Vice President to establish the firm's West Coast fixed income department, and in 1988 joined Prudential Securities as Senior Vice President and Western Regional Manager. Mr. Kellett is a highly esteemed specialist in the areas of investment management

analytics, technology systems and design. His professional qualifications include designations as a General Securities Principal, Registered Options Principal, Universal State Securities Representative, Interest Rate Options Principal, Commodities Futures Principal, and Municipal Securities Principal. Founded KCM in 1996.

John A. Lundin

Born in 1950, Mr. Lundin serves as Senior Portfolio Manager. Mr. Lundin graduated from the University of California, Berkeley in 1973 with a BA degree in Economics. He received an MBA in finance from Golden Gate University in 1981. Mr. Lundin began his career with the U.S. Department of the Treasury Comptroller of the Currency as a National Bank Examiner in 1973. In 1977, he joined Bank of America in the Credit Examination Department – Bank-wide, which monitored major credits worldwide and loan losses. In 1981, he joined Scudder, Stevens and Clark, later renamed Scudder Investments. He was a Senior Vice President and Portfolio Manager in charge of the Private Investment Counsel Group in San Francisco which specialized in equity and fixed income securities for high net worth individuals. Mr. Lundin is a member of the Chartered Financial Analysts Society of San Francisco and joined KCM in 2000.

John C. Pogue

Born in 1943, Mr. Pogue joined KCM in 2003 as a Senior Portfolio Manager. Recently, Mr. Pogue was named President of the firm. John graduated from Trinity College, Hartford CT, in 1966 with a BA degree in economics. Following three years of active duty as a Naval officer aboard the USS Regulus, Mr. Pogue began his investment career in 1970 with Wells Fargo Bank as a municipal bond trader and, eventually, as Vice President in charge of the taxable bond department. In 1976, Mr. Pogue joined the institutional bond department of A.G. Becker (acquired by Merrill Lynch), and in 1979 opened and managed a West Coast office for Briggs, Schaedel & Co. (a Primary Government Dealer). In 1983, Mr. Pogue became a Sr. Vice President at Dean Witter Reynolds with West Coast responsibility for institutional taxable fixed income securities. In 1997, Mr. Pogue started Pogue Capital Management.

Michelle Drugy

Born in 1971, Ms. Drugy serves KCM as a Senior Portfolio Manager. A graduate of the University of California, Irvine cum laude in 1996. She received a Master of Public Policy degree with a focus on finance from the University of Southern California in 2004. Michelle has been in the investment industry for over fifteen years, having held the positions of Regional Financial Planner with Morgan Stanley, Investment Officer of the County of San Diego and the Chief Investment Officer for the City and County of San Francisco. Michelle joined KCM in March 2017.

William L. Prince, CFA

Mr. Prince was born in 1956, and has served as KCM's Chief Operating Officer and Portfolio Manager since 2000. Bill graduated with Bachelors of Arts cum laude from Boston University majoring in Philosophy and Music in 1978, and earned the Chartered Financial Analyst (CFA) designation in 2003. Mr. Prince has considerable private client and institutional experience, having held positions of Director of Investment Management Services at RNC Capital Management in Los Angeles, California 1986-1988, Senior Regulatory Securities Accountant with Jefferies and Co., Los Angeles, California 1988-1992, and Vice President and Director of Operations at Wall Street Associates, La Jolla, California

from 1992 to 2000 where he served on the Investment Committee for this leading national SMID managers. Mr. Prince provides considerable expertise in the areas of benchmark analytics, stock screening, research, trading and trading technology. Mr. Prince has been a member of the New York Society of Security Analysts since 1999 and the Chartered Financial Analysts Society of San Francisco since 2003.

Donald O. Jesberg

Born in 1955, Don has served as Senior Portfolio Manager since 2006. Mr. Jesberg graduated from the University of Southern California in 1977 with a Bachelor's degree in Business Administration with an emphasis in Finance. Don has been in the investment business for more than 30 years with various brokerage and investment advisory firms. Prior to joining KCM Don served as Vice President at Reynolds Capital Management in Larkspur, California working with individually managed portfolios and serving as an officer for the Reynolds Funds, Inc

Starting in June 2014 Don concurrently serves as an executive outside director for Sedgwick Street Fund, LLC. This board of directors serves a family office management company in the capacity as experts in portfolio management, asset allocation and security analysis. KCM's management believes this endeavor does not present a conflict of interest for KCM and our clients, moreover, believes the Sedgwick relationship brings added depth for our team.

Additional Manager Disclosure

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 each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Other Business Activities

Registered investment advisers are required to disclose all material facts regarding any other business activities that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Additional Compensation

Starting in June 2014 Don Jesberg concurrently serves as an executive outside director for Sedgwick Street Fund, LLC. This board of directors serves a family office management company in the capacity as experts in portfolio management, asset allocation and security analysis. KCM's management believes this endeavor does not present a conflict of interest for KCM and our clients, moreover, believes the Sedgwick relationship brings added depth for our team.

Supervision

All manager activities are overseen by the firm's Senior Portfolio Managers and the CCO. CCO activities are supervised by CEO.

Item 5 – Fees and Compensation

KCM provides professional management of stock and bond portfolios, for a fee based on the market values of the portfolios at the end of each quarter, payable quarterly, in arrears. Applicant's fees are negotiable. No particular ranges have been pre-established with respect to accounts that are the subject of negotiated fees. Applicant's basic annual fee structure is:

Cash Management	0.40%
Investment Grade Fixed Income	0.50%
Equities, ADRs, ETFs, ETNs	0.90%
Open and Closed End Mutual Funds,	0.90%
Preferred Stock and Hybrid Securities	0.90%

Investment advisory fees are billed quarterly generally in arrears based upon the market value of the account at the end of the current quarter. In some cases, a client is also billed for the balance of the quarter in which his account was opened in addition to the following full quarter. The term "quarter" refers to either a calendar quarter or the client's fiscal quarter. The initial quarterly fee for new clients is pro-rated based upon the date the account is opened. Clients of KCM are subject to a 30-day termination fee based upon assets under management at the date of termination. This fee may be charged, at the sole discretion of the Advisor.

Ordinarily, KCM has the ability to directly debit fees from client accounts. Currently, the investment management agreement stipulates the direct debit of fees from the client accounts. Clients have the option to have their fees billed separately, by making prior arrangements with KCM.

At KCM's discretion, and often in circumstances involving larger accounts, including Cash Management Accounts, KCM's fees are negotiable. No particular ranges have been pre-established with respect to accounts that are the subject of negotiated fees. There are no fees payable before service is provided. Clients and/or KCM may terminate the investment advisory contract upon 30-day written notice. KCM does not provide clients advice as to the tax deductibility of its advisor's fees. Clients are directed to consult a tax professional to determine the potential tax deductibility of our fees.

Special circumstances may cause fees to vary from the above schedule. KCM may group multiple accounts of one client relationship together for purposes of calculating the fee. Or, KCM may not charge a fee to small accounts of a client because of the fee the client is paying on the total relationship. KCM reserves the right to negotiate fees with clients. KCM may charge higher or lower fees than those described above with the consent and acceptance by Client.

KCM reserves the right, and may at its discretion charge lower fees than those agreed to and as described in the IMA (Investment Management Agreement). Cash and other asset classes may be charged at a lower rate, or no rate at all depending on certain client circumstance and other portfolio considerations. Further, KCM may adjust rates down (reduce) from the IMA rates without explicit written consent of Client.

KCM has in the past acted as portfolio manager for wrap-fee or special sub-advisor to an investment consultant type programs. KCM may add similar programs and relationships in the future. KCM's fees for portfolio management of wrap-fee programs are based on assets managed and may be different from accounts managed by KCM directly. Some custody relationships require a minimum account size, or annual fee. Wrap-fee and overlay clients receive a brochure from the introducing sponsor detailing all aspects of the wrap-fee or overlay program before selecting KCM as the sub-advisor. Fees and features of each program offered by the various introducing sponsors will vary. Wrap-fee or overlay clients should consult the introducing sponsor's brochure for the specific fees and features applicable to their program. For wrap-fee or overlay accounts, introducing sponsors and KCM generally share in a combined service fee charged by the introducing sponsor. KCM is generally paid a portion of the fee by the introducing sponsor for advisory services, while the introducing sponsor retains the remainder for trade execution, custody and additional services.

KCM's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Such costs are exclusive of and in addition to KCM's fee, and KCM does not receive any portion of these costs. Please refer to Item 12 of this brochure regarding KCM's brokerage practices and the factors that KCM considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation. Furthermore, clients whose assets are invested in ETFs (Exchange Traded Funds), ETNs, (Exchange Traded Notes), Mutual Funds, and Money Market Accounts where a management fee is assessed as an expense, are in effect, paying two advisory fees. First, clients pay a regular quarterly fee on the money value of total assets under KCM's management, which includes the assets that are invested in the aforementioned funds. In addition, clients pay another fee to the investment adviser or sponsor of the fund based upon the amount of their investment in that fund.

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

KCM does not have any performance fee arrangements. If in the future KCM were to enter into such a fee arrangement with qualified clients, we will structure any performance or incentive fee arrangement subject to Section 205(a)(1) of the Investment Advisers Act of 1940.

Item 7 – Types of Clients

KCM provides portfolio management services to high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, foundations, endowments, and trust program either through direct contract or through relationships with outside wealth managers and wrap sponsors. KCM generally has a minimum account size of \$500,000 for opening a direct account, based on the product in which the client invests, subject to negotiations.

KCM presently acts and/or reserves the right in the future to act as a Sub-Advisor for other Investment Consultants, Investment Advisors, Registered Investment Advisors and to various broker and broker-dealers as a preferred provider or managed account provider.

KCM has agreements with certain outside and independent firms whereby KCM agrees to manage accounts, which select KCM as an investment advisor. Under these agreements, the client typically will pay a single fee based on a percentage of assets under management. In some arrangements the client has a separate agreement with KCM and pays KCM separately. In others arrangements, the client will pay one fee to the referring broker or advisors which would include consulting, manager search, performance measurement, custodial services with a single fee based on a percentage of assets under management. In some programs, brokerage commissions may be included in the single fee.

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

Both fundamental and quantitative valuation factors are considered in establishing positions in securities and in monitoring their progress. KCM is keenly interested in the future prospects of the company and the industry in which it competes. KCM believes that superior investment results are driven by capitalizing on market mispricings. For both equity, fixed income and balanced portfolios, KCM employs what it considers are the strengths of fundamental, technical and cyclical macro analysis.

Investing in securities involves risk of loss that clients should be prepared to bear. KCM uses systems and analyses to achieve stable growth and income on a firm level, as well as portfolio specific risk controls, however, there is no guarantee that our strategies will prove effective in all market conditions.

KCM encourages all current and prospective clients to carefully consider; (i) committing to management only those funds that are not going to be needed for current purposes, and that can be invested on a long-term basis, usually a minimum of three to five years, (ii) that volatility from investing in securities can be expected to occur, and (iii) that current income and interest from dividends will most likely be minimal for equity only accounts, or from the equity portions of balanced portfolios.

KCM does not warrant or guarantee any type of return, nor assure or imply any kind of assurance or guarantee against loss of principal. All investments involve some type of risk, and KCM will work with each client to determine an optimal investment solution based upon your individual return requirements and objectives. **Any disclosure of past returns achieved by KCM or the broader markets should not be considered as a reliable predictor of future results**

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 KCM or the integrity of KCM's management. KCM has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Item 10 is not applicable.

Item 11 – Code of Ethics

KCM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts, and personal securities trading procedures, among other things. All supervised persons at KCM must acknowledge the terms of the Code of Ethics annually, or as amended.

KCM's employees and managers are required to follow the Company's Code of Ethics. Subject to satisfying this company policy and applicable laws, managers and employees of KCM may trade for their own accounts in securities, which are recommended to and/or purchased for their clients. KCM has adopted a written Code of Ethics designed to prevent any potential conflict of interest with client transactions. Thus, the Code designates certain classes of securities as exempt securities and certain classes of transactions as exempt transactions, based upon a determination that these would not materially interfere with the best interests of KCM's clients. Employee trading is regularly monitored under the Code of Ethics in order to ensure employees comply with the Code of Ethics, and to ensure the Code of Ethics reasonably addresses conflicts of interest between KCM and its clients.

Additionally, in appropriate circumstances and consistent with a client's investment objectives, KCM anticipates that it will cause accounts over which it has full management authority to effect, and will recommend to investment advisory clients, the purchase or sale of securities in which accounts of KCM's other clients are at the same time effecting a purchase or sale in the same securities. Prior to entering into a specific transaction, a determination will be made by the persons performing the advisory duties for such account that participation in such transaction will most likely be relatively beneficial to such account.

KCM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting William Prince, CCO.

Item 12 – Brokerage Practices

KCM generally receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is exercised in a manner consistent with the stated investment objectives for the particular client account.

Except in those instances where a client wishes to retain discretion over broker selection and commission rates, KCM accepts discretionary authority to determine the brokers used and the commissions paid. In the absence of any client direction to utilize a particular broker or dealer for the execution of transactions in any client accounts, KCM's overriding objective in effecting portfolio transactions is to obtain the best combination of price and execution. KCM seeks to effect each transaction at a price and commission that provides the perceived most favorable total cost or proceeds reasonably attainable under the circumstances. KCM may consider various factors when selecting a broker or dealer,

including, but not limited to: the nature of the portfolio transaction; the size of the transaction; the execution, clearing and settlement capabilities of the broker or dealer; the desired timing of the transaction; confidentiality; and, under appropriate circumstances, the availability of research and research-related services provided through such broker or dealer. Research services may be provided in the form of written reports, telephonic communications, economic and market data, credit analyses, news services, electronic information, analytic software, analyst earnings revisions, etc., and may contain information concerning securities markets, the economy, individual companies, pricing information and services, performance studies and other information providing assistance in the performance of KCM's investment decision-making responsibilities.

Cross Trading

Policy Summary: KCM is a registered investment advisor who provides investment services to institutional, high net-worth, foundations, trusts and wealth management clients. Clients that are subject to the Employee Retirement Income Security Act (ERISA) regulations or regulations modeled after ERISA (ERISA• Equivalent), such as state, city and municipal pension funds, are prohibited from engaging in cross-trades. While the DOL has issued a class exemption that will allow investment advisors to engage in cross trades for their ERISA clients if the assets of each participant's plan are in excess of \$100 million, we believe there is still ambiguity in their statements and it be prudent for KCM to exempt this class of clients to engage in cross-trading transactions.

KCM will only consider a cross-trade for unlisted fixed income securities.

Cross-trades between two non-ERISA or non-related clients are permitted if there are no client restrictions on such trades and KCM is not acting as a broker or principal and does not receive direct or indirect compensation such as a commission (other than its regular advisory fee). As a result of the extensive regulations surrounding cross trades, the Chief Compliance Officer or another member of the Senior Management Team prior to execution must approve these transactions. Full documentation of these trades will be kept and reviewed by Compliance Personnel.

Definitions:

Cross-Trade A buy and sell transaction directly between two or more accounts under the full discretion of KCM. Cross trades are only placed in an effort to eliminate or reduce transactional expenses when KCM has clients buying and selling the same security at the same time for various reasons.

Customary Transfer Fees Fees charged by a third-party broker and/or custodian for service or accommodation fees, usually in connection with the processing of the cross-traded transaction(s).

Cross-Trade Procedures:

A cross-trade must meet the following conditions:

- The transaction is a purchase or sale, for no consideration other than cash payment against prompt delivery of a security for which market quotations are not readily available.
- The transaction is affected at the independent current market price of the security. The current market price is determined to be:
- The highest bid (offer to buy) available from KCM's stable of over 80 participant active broker/dealers,
- The proposed cross-trade transaction must be motivated and initiated by a cash need or event from the one client along the particular eligible fixed income security.
- The cash need or event might be to buy a different asset, create cash for proposed client withdrawal, or to rebalance the portfolio in adherence to revised or revisited client objectives set by the portfolio manager or the client.
 - (i) Our Senior Fixed Income traders establish the fair and unbiased cross-trade price by obtaining the best bid as the crossing price.
 - (ii) By using this price, the selling party to the cross receives the exact best prevailing price they would have received had they sold the issue and size into the public market.
 - (iii) KCM makes certain that for each cross, KCM follows the same standards and protocols for all fixed income sales and cannot favor any one side to the cross.
 - (iv) The bonds are put out to same universe of buyers known to KCM. The highest price generated from this impartial process is then determined to be the de-facto market price, as the seller would receive this same price whether or not the bond is crossed to another KCM client or not.
 - (v) Concurrently, if the bond is determined to be a good and desirable value and fits the investment guidelines of another account, the cross is consummated.
 - (vi) The buyer in the cross pays the broker transaction fee of approximately \$100.

KCM further attests:

- No brokerage commission, fee (except for customary transfer fees), or other remuneration is paid in connection with the transaction;

- That KCM garners no direct or indirect benefit from the broker or agent used to consummate this cross-transaction;
- That KCM maintains and preserves for a period not less than six years from the end of the fiscal year in which any transactions occurred, the first two years in an easily accessible place, a written record of each such transaction setting forth a description of the security purchased or sold, the identity of the person on the other side of the transaction, the terms of the purchase or sale transaction, and the information or materials upon which the determinations described in the discussion in the paragraphs above were made.

Research and Other Soft Dollar Benefits

In placing orders for the purchase and sale of securities for its clients, KCM seeks quality execution at favorable prices through responsible broker-dealers. In selecting broker-dealers to execute transactions, KCM considers such factors as the broker's reliability, the quality of its execution services, its financial condition, its commission rates on agency transactions, and the general brokerage and research services that it may provide. As authorized in Section 28(e) of the Securities Exchange Act of 1934, KCM may cause its clients to pay a broker-dealer that provides brokerage and research and portfolio analysis services to KCM an amount of commissions in excess of the commissions that another broker-dealer would have charged for effecting a transaction.

KCM uses client brokerage commissions to obtain research or other products or services, and receives a benefit because it does not have to produce or pay for the research, products or services.

KCM does not have any contractual arrangements in place and does not currently use brokerage commissions to obtain products or services which do not qualify for the safe harbor rules in Section 28(e) of the Act as above.

Research services furnished by brokers and dealers with whom KCM and its affiliates effect transactions may be beneficial to certain of the accounts advised by KCM. It is recognized that a particular account may be charged a commission paid to a firm who supplied research services not utilized by such account. However, KCM expects that each account will be benefited overall by such practice because each is receiving the benefit of research services and the execution of such transactions not otherwise available to it without the allocation of transactions based upon the recognition of the value to such research services. KCM assesses its commission policies, rates and allocations. This review considers the contributions and value of research services received from broker-dealers.

If a client decides to direct where its brokerage is placed by KCM, the client should consider: (i) KCM has existing integrated trading and reporting systems with some brokers which reduce the cost of transacting business with those brokers; (ii) a client who directs KCM to use a specific broker may pay higher commissions on some transactions than might be attainable by KCM, or may receive less favorable execution of some transactions, or both; (iii) a client who directs KCM may forego any benefit from savings on execution costs that KCM could obtain for its clients through negotiating volume discounts on batched

transactions; (iv) a client who directs KCM may restrict KCM from receiving research-related products and services available from other brokers; (v) KCM may not begin to execute client securities transactions with broker-dealers which have been directed by clients until all non-directed brokerage orders are completed; and (vi) clients directing commissions may not generate returns equal to clients which do not direct commissions.

In the event that trade allocation is relevant, KCM's trade allocation policy is designed to ensure fair and equitable allocation of investment opportunities among accounts over time and to ensure compliance with applicable regulatory requirements. Accounts are treated in a non-preferential manner, such that allocations are not based upon account performance, fee structure or Portfolio Manager. This policy is not intended to provide mathematical precision in all instances. Likewise, the timing of an account's funding and/or the timing of contributions or withdrawals will impact the timing and nature of actions taken. As a result, variations in the positions and weights will naturally exist between client accounts.

When blocking orders together, portfolio managers must designate allocations by account prior to placing an order with trading. Fully executed orders will be allocated on a pro-rata, average price basis. Partial fills of orders will also be allocated pro-rata, on an average price basis, subject to certain limited exceptions. In the case of partially filled and partial completes limit orders, KCM's trading desk employs a random account generator to ensure impartial fairness for allocation decisions.

Item 13 – Review of Accounts

Review of Accounts: Accounts are reviewed on a regular basis by a senior member of the portfolio management team assigned to the client account.

Accounts are reviewed:

- (1) when a decision has been made regarding a security held in the account, such as the addition, liquidation or the change of a position
- (2) when prompted by client communication
- (3) when notified of a contribution or withdrawal of assets
- (4) when a decision has been made to alter the asset allocation
- (5) at the discretion of the portfolio manager
- (6) when manager has determined that market price fluctuation (equity or fixed income asset classes), style drift or other market factors have moved to the extent that allocation thresholds might be out of target objectives.

Portfolio Managers and their Portfolio Assistants maintain a record of client objectives, risk profile, restrictions and unique guidelines. On a quarterly basis, the Portfolio Manager and or the Portfolio Assistant will review portfolio performance, composition, and adherence to written objectives. Further, at the beginning of each new calendar quarter, Portfolio Managers will attest formally that all client account have been reviewed and checked against stated investment objectives if any.

Objectives, constraints, restrictions and asset composition can and do change for many clients. The Portfolio Manager will maintain notes to any modifications made for client, and the client will be sent an email within 48 hours of such changes made outlining the new mandate, understanding or other adjustments agreed to.

Client portfolio reports are furnished to each client on a quarterly basis. Reports generally include a written Market Commentary, Portfolio Summary, Assets in Portfolio, and Transaction Schedule. Additional reports may be provided upon request.

KCM is aware of its obligation to recommend suitable investments for its accounts. It also understands that without an effective compliance program, there is a risk that investments could be made that are not suitable. To reduce the risk that unsuitable investments will be recommended for its accounts, KCM implemented the following transactional, periodic and forensic tests into its compliance program.

Examples of Transactional Testing

KCM implemented a pre-trade system that is designed to recognize key characteristic of each proposed investment at the time the order is entered (such as quality, maturity, asset class and market capitalization). The testing compares these

characteristics against the account investment objectives, risk tolerances, client restrictions, and any list of restricted securities. Trades that exceed parameters established will result in an exception that is reviewed by the trading department, portfolio accounting and the portfolio manager. This system provides KCM with ongoing transactional testing of account activity.

Examples of Periodic Testing

Many parts of KCM's internal controls rely on the information provided in an account's written profile form. KCM recognizes that ensuring account profiles are completed and relatively current is an important part of its compliance program. KCM implemented the following periodic testing procedures to ensure that it is able to detect accounts with incomplete or stale profiles.

When an account is opened, the profile information is entered into our portfolio accounting database. On a quarterly basis, Portfolio Managers, Assistant Portfolio Managers and Compliance Personnel compare the database information against the actual account profile to detect discrepancies.

Example of Forensic Testing

KCM utilizes a forensic test to analyze the returns for accounts with similar investment objectives over quarterly, YTD and annual periods. The CCO examines this data to perform dispersion analysis, looking for account whole performance falls outside of an acceptable range around the main return for all accounts.

This language has been added to the KCM Policies and Procedures Manual and has been signed-off and acknowledged by all employees.

Item 14 – Client Referrals and Other Compensation

KCM has entered into an agreement with Charles Schwab & Co., Inc. an independent and unaffiliated broker-dealer ("Schwab") to participate in the Schwab Advisor Network ("the Service"), an advisor referral service designed to help investors find an independent professional Investment Manager/Advisor in their area. KCM has agreed to pay Schwab a fee for participating in the Service. This fee may be increased, decreased or waived by Schwab from time to time

KCM may recommend to a client a broker/dealer that has referred clients to KCM only when KCM believes that said broker/dealer is capable of providing the high level of services to the client and when fees and expenses associated with said broker/dealer are deemed to be fair and reasonable for the level of service provided. In some cases KCM will direct brokerage to certain brokers or dealers who have also referred clients to KCM. Under such

circumstances, the client is not, in all instances, assured of the lowest commissions and/or broker/dealer compensation. In addition to the Service as mentioned in paragraph above, KCM participates and/or may at a future date participate in a number of referral programs that provide qualified leads to KCM. Participation in these programs may pose potential conflicts of interest. KCM does not directly compensate the program sponsor for these leads. The leads are not required to custody their assets with the program sponsor. If the lead decides to engage the services of the program sponsor, it should be assumed that the program sponsor will be the primary broker for the account and, as a result, will receive compensation in the form of brokerage commissions and related fees by the sponsor for the account.

Item 15 – Custody

KCM does not take custody or possession of any assets or securities of any client, except as is required in conjunction with the pre-approved collection of client fees.

Due Inquiry. Pursuant to SEC Custody Rule 206(4)-2 KCM verifies annually that clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains custody of client assets. Clients are encouraged to carefully review such statements and to compare such official custodial records to the account statements that KCM may provide to clients or their advisers. **KCM statements may vary occasionally from custodial statements based on accounting procedures, accrued interest for fixed income securities, reporting dates, or valuation methodologies of certain securities. Most importantly, KCM does not value portfolios with accrued common stocks or preferreds. We consider this to be the conservative position and ordinarily means KCM statements (valuations) will be less than custodian/broker.**

Pursuant to SEC Rule 206(4)-2(d)2(i) KCM does not in any circumstance maintain possession to client funds or securities. Any inadvertent receipt of proceeds of class action settlement checks or physical shares delivered by client are recorded in a log, reported to management and forwarded to client directly within 24 hours of receipt.

KCM will not deliver or forward to any third party. A log entry is recorded and senior client representative must document the details for the specific issue.

Item 16 – Investment Discretion

Generally, KCM clients grant it full discretionary authority over securities purchases and sales, subject to investment objectives and guidelines that are established by agreement between KCM and the client at the time the account is opened. Absent instructions to the contrary from the client, KCM has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, amount of securities to be bought or sold, broker/dealer to be used and commission rates to be paid.

The investment advice given to each client is based on the client's investment objectives and individual needs. **KCM will rely upon you**, the client, to update us about any changes in your life or in the status of the account that may affect issues such as risk tolerance, income requirements, taxes, investment time horizon, downside risk, or return requirement. KCM does not believe in a one-size-fits-all approach, and our business is structured to provide individualized and customized accounts advice, structure and management.

In certain situations client accounts may come to KCM with stock, bond or mutual fund holdings identified by the client to be retained or client desires to control the size and value of this holding in the portfolio account. At the beginning of our client/advisor relationship, KCM will code these securities as "Un-Managed" (previously "Unsupervised"). We shall not vote proxies, have dispositive power, nor vote on issues relating to tender offers or recapitalizations. Accordingly, it is incumbent upon you, the de-facto owner of these Un-Managed securities to obtain the necessary forms from your broker or custodian to vote proxies and other corporate governance issues that arise from time to time. KCM will identify these holdings clearly and distinctly as "Un-Managed" on each regularly prepared statement of account. Through this disclosure, KCM relinquishes all responsibility for these securities, their merits or suitability for the portfolio or the account holder, and will not be included as a billable asset or part of the billable account in accordance with our fee schedule as defined in this document.

Where KCM has discretion to select the executing broker, KCM will endeavor to select those brokers or dealers which will provide the best services at the lowest commission rates possible. The reasonableness of commissions is based on the broker's ability to provide professional services, competitive commission rates, research and other services, which will help KCM in providing investment management services to clients. KCM may, therefore, recommend the use of (or use) a broker who provides useful research and securities and portfolio management services even though a lower commission may be charged by a broker who offers no research services and minimal securities transaction assistance.

Item 17 – Voting Client Securities

Proxy voting policies and procedures are required by Rule 206(4)-6 of the Advisers Act. KCM's Proxy Voting Policy and Procedures, which are currently effective, are reviewed at least annually to ensure that they are adequate and effective.

KCM has adopted Proxy Voting Policy Procedures that are reasonably designed to ensure that KCM is voting in the best interest of its clients. In our ongoing effort to better serve you, KCM has contracted with Institutional Shareholder Services (ISS) Proxy Voting and Securities Class Action Services. ISS is the global leader in their field of expertise and believe it to be a clear benefit for our clients to have experts provide class action litigation monitoring and claim filing effective June 30, 2016.

In the past, KCM Investment Advisors LLC has processed claims on behalf of our clients. With the proliferation of class action suits against corporations in which some of our clients are invested, we feel it is important to provide all of our clients the ability to participate in the recovery of any and all claims from such suits. Industry spokespeople

anticipate \$200 Billion in class action awards to be paid out over the next decade. KCM believes that contracting with outside experts in the field for monitoring, filing, administrating and payment processing is in the best interest of all our clients and employees.

Aside from freeing KCM to focus on your portfolios, having ISS as a business partner to process and file class action claims should capture more awards available. ISS monitors each claim you have, collects the applicable documentation, interprets the terms of each settlement, files the appropriate claim form, interacts with the administrators and distributes your award on your behalf. KCM has negotiated a discounted contingency fee of 20% for its clients, which ISS will automatically subtract from an award when the award is paid.

Upon the commencement of this service, ISS will look back through available records and make filings for any and all cases that remain open for claims to be filed.

We are pleased to provide this service to you and are confident the outsourcing of this specialized organization will benefit our clients. You have to opportunity to "OPT-OUT" of this service if you choose.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide certain financial information or disclosures about their financial condition. KCM 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

Item 19 – Client Directed Trades and Un-Managed Holdings

KCM manages many accounts held at brokerage firms and custodian banks. These custodial agents (Charles Schwab, Smith Barney, Fidelity Investments, Union Bank, etc) will accept orders from you, the registered account holder. These orders are generally coded "unsolicited." Should you, the registered account holder place orders to buy or sell securities in your account, either at a branch office, over the telephone or through some kind of on-line electronic mechanism, KCM **will not** be responsible for this security transaction, nor will be assumed to have knowledge of the value nor merits of the investment. KCM will not, in most instances be qualified to offer more than a cursory opinion about this security holding. We will code any such purchase in your account as "Un-Managed" formerly "Unsupervised". In doing so, KCM will forego any trading and/or voting authority relating to this holding(s), and shall not vote proxies or make judgments regarding tender offers, mergers, reorganizations or other corporate governance issues that may arise in the future. Accordingly, all assets marked "Un-Managed" are not included as billable assets. When KCM sends you a monthly and/or quarterly statement of account, "Un-Managed Assets" formerly "Unsupervised" are segregated away from the securities managed by KCM on your periodic statement of account, and clearly labeled as "Un-Managed" securities.

In a similar fashion, client accounts may come to KCM with stock, bond or mutual fund holdings identified by the client that he/she wishes to retain or desires to control the size

and value of this holding in the portfolio account. At the beginning of our client/advisor relationship, KCM will code these securities as "Un-Managed." We shall not vote proxies, have dispositive power, nor vote on issues relating to tender offers or recapitalizations. Accordingly, it is incumbent upon you, the de-facto share or bondholder to obtain the necessary forms from your broker or custodian to vote proxies and other corporate governance issues that arise from time to time. As with the paragraph above, KCM will identify these holdings clearly and distinctly as "Un-Managed" on each regularly prepared statement of account. Through this disclosure, KCM relinquishes all responsibility for these securities, their merits or suitability for the portfolio or the account holder, and will not be included as a billable asset or part of the billable account in accordance with our fee schedule as defined in this document.

Item 20 – KCM Privacy Policy and Information Security Program

Pursuant to SEC best practices and the Commonwealth of Massachusetts Standards for Protection of Personal Information, KCM Investment Advisors LCC (KCM) has adopted a robust Privacy Policy aimed at protecting all client confidential and nonpublic information and to safeguard personal information contained in both paper and electronic records. The objectives of this requirement are to ensure the security and confidentiality of client information in a manner fully consistent with industry standards, and to protect against unauthorized access to or use of such information that may result in substantial harm or inconvenience to any client.

KCM has a commitment to the safeguarding against unauthorized acquisition or unauthorized use of unencrypted data, or encrypted electronic data for all clients. To this end the following persons are designated to implement, review and revise as necessary a comprehensive information security program: Chief Compliance Officer (CCO), Chief Technology Officer (CTO). The primary objectives for the CCO and CTO are to identify and assess reasonably foreseeable internal and external risks to the security, confidentiality and/or integrity of any electronic, paper or other records containing personal information and evaluating and improving, where necessary, the effectiveness of our current safeguards for limiting such risks. To this end, KCM employs;

1. Ongoing employee training
2. Testing of electronic encryption
3. Setting policy for employees relating to the storage, access and transportation of client records.

KCM does not share any nonpublic personal information with any nonaffiliated third parties, except in the following circumstances:

1. As necessary to provide the service that the client has requested or authorized, or to maintain and service the client's account;
2. As required by regulatory authorities or law enforcement officials who have jurisdiction over KCM or as otherwise required by any applicable law; and
3. To the extent reasonably necessary to prevent fraud and unauthorized transactions.

KCM's managers and employees ("KCM Personnel") are prohibited, either during or after termination of their employment, from disclosing nonpublic personal information to any person or entity outside of the Registered Investment Advisor / Client relationship, except under the circumstances described above. KCM Personnel are permitted to disclose nonpublic personal information only to such other KCM Personnel who need to have access to such information to deliver our services to the client.

Security of Client Information

KCM restricts access to nonpublic personal information to KCM Personnel who need to know such information to provide services for the client. Any KCM Personnel who are authorized to have access to nonpublic personal information are required to keep such information in a confidential compartment or receptacle on a daily basis as of the close of business each day. All electronic or computer files containing such information shall be password secured and firewall protected from access by unauthorized persons. Any conversations involving nonpublic personal information, if appropriate at all, must be conducted by KCM Personnel in private, and care must be taken to avoid any unauthorized persons overhearing or intercepting such conversations.

Privacy Notices

KCM will provide each client with an initial notice of the KCM's privacy policy at the earlier of the time Part II of the KCM's Form ADV is delivered or an account is established. KCM maintains a web site, and the privacy policy will be posted to the site.

Disposal of Nonpublic Personal Information

KCM will shred, deliver to a document destruction firm, or other render illegible hard copies of any customer or consumer nonpublic personal information in its possession when the KCM deems possession of the information to no longer be necessary.

Nonpublic personal information stored on disk, CD, tape or other electronic media shall be cleared, purged, declassified, overwritten and/or encrypted in such a manner so that any information contained therein cannot be restored or decrypted. After the electronic media is cleared, purged, declassified, overwritten or encrypted, the CTO shall check that the original information is not backed-up or saved on a hard drive, recycle bin or other memories.

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Jay A. Kellett

**KCM Investment Advisors LLC
750 Lindero Street, Suite 350, San Rafael CA 94901
(415) 461-7788**

This Brochure Supplement provides information about Jay Kellett that supplements the KCM Investment Advisors LLC Brochure. You should have received a copy of that Brochure. Please contact our firm's Chief Compliance Officer if you did not receive KCM Investment Advisors LLC's Brochure or if you have any questions @ Compliance@Kcmadvisors.com, or (800)287-5555.

Item 2 – Educational Background and Business Experience

Mr. Kellett was born in 1945, and serves as KCM's acting CEO and CIO. Jay received a BS degree from the University of Wisconsin at Madison, where he also attended the Graduate School of Business and Finance. In January of 1970, Mr. Kellett joined Smith Barney & Co. in the corporate bond department in New York and was transferred to San Francisco as a member of the institutional fixed income department. In 1981, Mr. Kellett joined Merrill Lynch as a Sr. Vice President to establish the firm's West Coast fixed income department, and in 1988 joined Prudential Securities as Senior Vice President and Western Regional Manager. Mr. Kellett is a highly esteemed specialist in the areas of investment management analytics, technology systems and design. His professional qualifications include designations as a General Securities Principal, Registered Options Principal, Universal State Securities Representative, Interest Rate Options Principal, Commodities Futures Principal, and Municipal Securities Principal. Jay founded KCM in 1996.

Item 3 – 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 each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 4 – Other Business Activities

Registered Investment Advisers are required to disclose all material facts regarding any other business activities that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 5 – Additional Compensation

Registered Investment Advisers are required to disclose all material facts regarding additional compensation that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 6 – Supervision

Mr. Kellett's portfolio management activities are overseen by the firm's Chief Compliance Officer and the firm's Senior Portfolio Managers as listed herein. The Chief Compliance Officer (415) 461-7788 or Compliance@KCMAdvisors.com

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John A. Lundin

**KCM Investment Advisors LLC
750 Lindero Street, Suite 350, San Rafael CA 94901
(415) 461-7788**

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Item 2 – Educational Background and Business Experience

Born in 1950, Mr. Lundin serves as Senior Portfolio Manager. Mr. Lundin graduated from the University of California, Berkeley in 1973 with a BA degree in Economics. He received an MBA in finance from Golden Gate University in 1981. Mr. Lundin began his career with the U.S. Department of the Treasury Comptroller of the Currency as a National Bank Examiner in 1973. In 1977, he joined Bank of America in the Credit Examination Department – Bankwide, which monitored major credits worldwide and loan losses. In 1981, he joined Scudder, Stevens and Clark, later renamed Scudder Investments. He was a Senior Vice President and Portfolio Manager in charge of the Private Investment Counsel Group in San Francisco which specialized in equity and fixed income securities for high net worth individuals. Mr. Lundin is a member of the Chartered Financial Analysts Society of San Francisco and joined KCM in 2000.

Item 3 – 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 each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 4 – Other Business Activities

Registered Investment Advisers are required to disclose all material facts regarding any other business activities that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 5 – Additional Compensation

Registered Investment Advisers are required to disclose all material facts regarding additional compensation that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 6 – Supervision

Mr. Lundin's portfolio management activities are overseen by the firm's Chief Compliance Officer and the firm's Senior Portfolio Managers as listed herein. The Chief Compliance Officer (415) 461-7788 or Compliance@KCMAdvisors.com

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John C. Pogue

**KCM Investment Advisors LLC
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(415) 461-7788**

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Item 2 – Educational Background and Business Experience

Born in 1943, Mr. Pogue joined KCM in 2003 as a Senior Portfolio Manager. In June 2017, Mr. Pogue was named President of the firm. John graduated from Trinity College, Hartford CT, in 1966 with a BA degree in economics. Following three years of active duty as a Naval officer aboard the USS Regulus, Mr. Pogue began his investment career in 1970 with Wells Fargo Bank as a municipal bond trader and, eventually, as Vice President in charge of the taxable bond department. In 1976, Mr. Pogue joined the institutional bond department of A.G. Becker (acquired by Merrill Lynch), and in 1979 opened and managed a West Coast office for Briggs, Schaedel & Co. (a Primary Government Dealer). In 1983, Mr. Pogue became a Sr. Vice President at Dean Witter Reynolds with West Coast responsibility for institutional taxable fixed income securities. In 1997, Mr. Pogue started Pogue Capital Management.

Item 3 – 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 each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 4 – Other Business Activities

Registered Investment Advisers are required to disclose all material facts regarding any other business activities that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 5 – Additional Compensation

Registered Investment Advisers are required to disclose all material facts regarding additional compensation that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 6 – Supervision

Mr. Pogue's portfolio management activities are overseen by the firm's Chief Compliance Officer and the firm's Senior Portfolio Managers as listed herein. The Chief Compliance Officer (415) 461-7788 or Compliance@KCMAdvisors.com

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Michelle Durgy

**KCM Investment Advisors LLC
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This Brochure Supplement provides information about Michelle Durgy that supplements the KCM Investment Advisors LLC Brochure. You should have received a copy of that Brochure. Please contact our firm's Chief Compliance Officer if you did not receive KCM Investment Advisors LLC's Brochure or if you have any questions @ Compliance@Kcmadvisors.com, or (800)287-5555.

Item 2 – Educational Background and Business Experience

Born in 1971, Ms. Durgy serves KCM as a Senior Portfolio Manager. A graduate from the University of California, Irvine cum laude in 1996. She received a Master of Public Policy degree where she focused on quantitative finance from the University of Southern California in 2004. Michelle has been in the investment industry for over fifteen years, having held the positions of Regional Financial Planner with Morgan Stanley, Investment Officer of the County of San Diego and Chief Investment Officer for the City and County of San Francisco. Michelle joined KCM in March 2017

Item 3 – 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 each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 4 – Other Business Activities

Registered Investment Advisers are required to disclose all material facts regarding any other business activities that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 5 – Additional Compensation

Registered Investment Advisers are required to disclose all material facts regarding additional compensation that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 6 – Supervision

Ms. Durgy's portfolio management activities are overseen by the firm's Chief Compliance Officer and the firm's Senior Portfolio Managers as listed herein. The Chief Compliance Officer (415) 461-7788 or Compliance@KCMAdvisors.com

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William L. Prince, CFA

**KCM Investment Advisors LLC
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(415) 461-7788**

This Brochure Supplement provides information about William Prince that supplements the KCM Investment Advisors LLC Brochure. You should have received a copy of that Brochure. Please contact our firm's Chief Compliance Officer if you did not receive KCM Investment Advisors LLC's Brochure or if you have any questions @ Compliance@Kcmadvisors.com, or (800)287-5555.

Item 2 – Educational Background and Business Experience

Mr. Prince was born in 1956, and has served as KCM's Chief Operating Officer and Portfolio Manager since 2000. Bill graduated with Bachelors of Arts cum laude from Boston University majoring in Philosophy and Music in 1978, and earned the Chartered Financial Analyst (CFA) designation in 2003. Mr. Prince has considerable private client and institutional experience, having held positions of Director of Investment Management Services at RNC Capital Management in Los Angeles, California 1986-1988, Senior Regulatory Securities Accountant with Jefferies and Co., Los Angeles, California 1988-1992, and Vice President and Director of Operations at Wall Street Associates, La Jolla, California from 1992 to 2000 where he served on the Investment Committee for this leading national SMID managers. Mr. Prince provides considerable expertise in the areas of benchmark analytics, stock screening, research, trading and trading technology. Mr. Prince has been a member of the New York Society of Security Analysts since 1999 and the Chartered Financial Analysts Society of San Francisco since 2004.

Item 3 – 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 each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 4 – Other Business Activities

Registered Investment Advisers are required to disclose all material facts regarding any other business activities that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 5 – Additional Compensation

Registered Investment Advisers are required to disclose all material facts regarding additional compensation that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 6 – Supervision

Mr. Prince's portfolio management activities are overseen by the Jay Kellett, CEO and the firm's Senior Portfolio Managers as listed herein. Jay Kellett (415) 461-7788 or JAK@Kcmadvisors.com

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Donald O. Jesberg

**KCM Investment Advisors LLC
750 Lindero Street, Suite 350, San Rafael CA 94901
(415) 461-7788**

This Brochure Supplement provides information about Donald Jesberg that supplements the KCM Investment Advisors LLC Brochure. You should have received a copy of that Brochure. Please contact our firm's Chief Compliance Officer if you did not receive KCM Investment Advisors LLC's Brochure or if you have any questions @ Compliance@Kcmadvisors.com, or (800)287-5555.

Item 2 – Educational Background and Business Experience

Born in 1955, Don has served as Senior Portfolio Manager since 2006. Mr. Jesberg graduated from the University of Southern California in 1977 with a Bachelors degree in Business Administration with an emphasis in Finance. Don has been in the investment business for more than 30 years with various brokerage and investment advisory firms. Prior to joining KCM Don served as Vice President at Reynolds Capital Management in Larkspur, California working with individually managed portfolios and serving as an officer for the Reynolds Funds, Inc.. Starting in June 2014 Don has concurrently serves as an executive outside director for Sedgwick Street Fund, LLC. This board of directors serves a family office management company in the capacity as experts in portfolio management, asset allocation and security analysis. KCM's management believes this endeavor does not present a conflict of interest for KCM and our clients, moreover, believes the Sedgwick relationship brings added depth for our team.

Item 3 – 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 each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 4 – Other Business Activities

Registered Investment Advisers are required to disclose all material facts regarding any other business activities that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item for the supervised person described herein.

Item 5 – Additional Compensation

Starting in June 2014 Don has concurrently serves as an executive outside director for Sedgwick Street Fund, LLC. This board of directors serves a family office management company in the capacity as experts in portfolio management, asset allocation and security analysis. KCM's management believes this endeavor does not present a conflict of interest for KCM and our clients, moreover, believes the Sedgwick relationship brings added depth for our team.

Item 6 – Supervision

Mr. Jesberg's portfolio management activities are overseen by the firm's Chief Compliance Officer and the firm's Senior Portfolio Managers as listed herein. The Chief Compliance Officer (415) 461-7788 or Compliance@KCMAdvisors.com