

Kaye Capital Management (“KCM,” “Firm,” “we,” or “us”) SEC-registered investment advisor and provides advisory services for a fee rather than for brokerage commissions. As a retail investor, it is important to understand the differences between the services and fees of an investment advisor and a broker-dealer. Investor.gov/CRS offers free and simple tools to research firms and financial professionals. Additionally, it also provides educational materials about broker-dealers, investment advisors, and investing.

What investment services and advice can you provide me?

We provide investment advisory services, including discretionary and non-discretionary investment management and financial planning to individuals, trusts, and estates (our “retail investors”).

When a retail investor engages us to provide investment management services, we monitor, on a continuous basis, the investments in the accounts over which we have investment authority as part of our investment management service. Furthermore, when engaged on a discretionary basis, we shall have the authority, without prior consultation with you (unless you impose restrictions on our discretionary authority), to buy, sell, trade, and allocate the investments within your account(s) consistent with your investment objectives. When engaged on a non-discretionary basis, the retail investor makes the ultimate decision regarding the purchase or sale of investments. In either case, our advisory authority over your account(s) shall continue until our engagement is terminated.

When a retail investor engages us to provide financial planning services, we rely upon the information provided for our review and do not verify or monitor any such information while providing this service. Our financial planning and consulting services are completed upon the communication of our recommendations to the retail investor.

We do not limit the scope of our investment advisory services to proprietary products or a limited group or type of investment.

We generally require a minimum account size of \$500,000 to enter into an Advisory Agreement. However, we retain the discretion to lower or waive that minimum.

Additional Information: For more detailed information about our *Advisory Business* and the *Types of Clients* we generally service, please click [here](#) or visit: <https://adviserinfo.sec.gov/firm/summary/109329>.

Conversation Starters

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

How will you choose investments to recommend to me?

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

What fees will I pay?

Investment Management: The amount paid to our firm and your financial professional generally does not vary based on the type of investments selected on your behalf. The asset-based fee reduces the value of your account and will be generally deducted from your account. Fees are billed monthly in advance. Our fees vary and are negotiable. Typically, the more assets you have in the advisory account, the more you will pay in total fees. We, therefore, have an incentive to increase the assets in your account in order to increase our fees. You will also pay fees to a broker-dealer or bank that will hold your assets (called “custody”). You pay our advisory fee even during periods when there are no transactions within the account.

Financial Planning: Clients receiving Investment Management Services and have a household asset level above \$500,000 may request Financial Planning Services for no additional charge. We may also offer stand-alone Financial Planning Services for either a flat or hourly fee. We may require that up to 50% of the total fee be paid in advance.

Other Fees and Costs: Your investment assets will be held with a qualified custodian. Custodians generally charge brokerage commissions and/or transaction fees for effecting certain securities transactions (for example, transaction and redemption fees may be charged for certain mutual fund transactions). These charges will be assessed in accordance with the qualified custodian’s transaction fee/brokerage commission fee schedule. Additional holdings fees for private investments may also be assessed by the client custodian. In addition, relative to certain mutual fund and exchange-traded fund purchases, certain charges will be imposed at the fund level (e.g., management fees and other fund expenses).

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Conversation Starters

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

Additional Information: For more detailed information about our fees and costs related to our management of your account, please click [here](#) or visit: <https://adviserinfo.sec.gov/firm/summary/109329>.

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

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means:

- We may recommend a particular custodian from whom we receive support services and/or products, certain of which assist us to better monitor and service your account.
- We may recommend rollovers out of employer-sponsored retirement plans and into Individual Retirement Accounts that we manage for an asset-based fee, which could have the effect of increasing our compensation.
- We may recommend commission-based insurance products, including through an affiliated insurance agency, which presents a conflict of interest in that those recommendations would increase an advisor's compensation. However, clients are under no obligation to purchase insurance products from KCM employees. Further, all KCM employees are bound by their fiduciary duty to put your interests ahead of ours.

Conversation Starters

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

Additional Information: For more detailed information about our conflicts of interest, please click [here](#) or visit: <https://adviserinfo.sec.gov/firm/summary/109329>.

How do your financial professionals make money?

Our financial professionals are compensated either on a salary basis or on the basis of a percentage of investment advisory fees collected by KCM. Financial professionals compensated on a salary basis receive a base compensation package and are eligible for additional compensation based upon the amount of investment advisory fees collected by KCM. Financial professionals compensated solely based on advisory fees collected by KCM receive a percentage of the total advisory fees collected by KCM, less applicable expenses. Compensation based on advisory fees collected presents a conflict of interest, as recommendations to clients and prospective clients could be made based on compensation to be received. All financial professionals are eligible for discretionary bonus compensation based on the firm and financial professional's overall performance. You should discuss your financial professional's compensation directly with your financial professional. Certain employees are licensed to sell insurance products through an affiliated insurance broker and receive commissions on the sales of those products. Clients are under no obligation to purchase insurance products or services from KCM employees.

Do you or your financial professionals have legal or disciplinary history?

No. We encourage you to visit www.investor.gov/CRS to research our firm and our financial professionals.

Conversation Starters

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

Additional Information

For additional information about our Firm, our investment advisory services, or to request a copy of the *relationship summary*, please go to www.kayecapital.com. You may also contact KCM at (310) 207-529 or by email at compliance@kayecapital.com, to request up-to-date information as well as to request a copy of the relationship summary. Further information can be found on the SEC's website: <https://adviserinfo.sec.gov/firm/summary/109329>.

Conversation Starters

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