

KEMP Financial Management, LLC



ADV Part 2A - Update Dated March 5, 2024

This Brochure provides information about the qualifications and business practices of Kemp Financial Management, LLC (“Kemp Financial”). 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.

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 Kemp Financial is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Kemp Financial who are registered, or are required to be registered, as investment adviser representatives of Kemp Financial.

Kemp Financial 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

Item 2 – Material Changes

Our last ADV Annual Update was dated March 31, 2023. Since that time, Items 4, 5, and 10 have been amended to reflect that the Firm only utilizes Third Party Advisers in select legacy accounts. Third Party Advisers are not utilized for the majority of current client accounts, and they will not be utilized for new client accounts.

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Item 4 – Advisory Business

Kemp Financial Management, LLC. (“Kemp Financial”) is a registered investment adviser that has provided investment advisory services since 1996. The owner of and principal investment adviser representative for Kemp Financial is Robert J. Kemp. Kemp Financial has been in business since 1988 and has approximately \$229,965,525 million in non-discretionary regulatory assets under management as of December 31, 2023.

At Kemp Financial our mission is to provide our clients with the potential for greater investment success through the application of investment strategies that are designed to ultimately lead to financial independence, security, and peace of mind. Our intent is to understand our clients’ 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 seeks to identify 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 implements the allocation strategy on a non-discretionary basis. For clients maintaining certain legacy retirement and non-retirement accounts, Kemp Financial continues to recommend one or more third party money managers that it had previously recommended to such clients (each, a “Third-Party Adviser”) to help implement the allocation strategy. Kemp Financial does not manage assets on a discretionary basis. While Kemp Financial’s 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 our clients come to us through introductions from existing clients or from relationships with other professionals like Certified Public Accountants, estate planning attorneys and insurance professionals. When Kemp Financial receives introductions from other financial professionals, there is no compensation or “referral fee” paid to those other professionals and they do not participate or share in any revenue earned by Kemp Financial. Kemp Financial provides a number of other services, usually in conjunction with our advisory services discussed above. We often coordinate our planning and advice with attorneys, insurance representatives and accountants to help our clients with various aspects of financial, tax 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 elect to hold a portion of their existing holdings due to tax consequences; such existing holdings will be used as part of our recommended 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, client accounts are managed in accordance with the client’s individual needs, risk tolerance, objectives and reasonable investment restrictions by purchasing and/or selling securities set forth in their personal Investment Policy Statement.

A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the assets in the former employer’s plan, if permitted, (ii) roll over the assets to the new employer’s plan, if one is available and rollovers are permitted, (iii) roll over to an individual retirement account (“IRA”), or (iv) cash out the account value (which could, depending upon the client’s age, result in adverse tax consequences). If Kemp Financial recommends that a client roll over his or her retirement plan assets into an account to be managed by Kemp Financial, such a recommendation creates a conflict of interest if Kemp

Financial will earn an advisory fee on the rolled over assets. Kemp Financial will typically recommend rolling over assets into an IRA so that the client can gain access to the types of investments recommended, which allows the client to maintain a portfolio that is consistent with his or her investment policy. Kemp Financial addresses this conflict of interest by seeking to obtain the current fees clients are paying along with past performance data within their retirement plan, in conjunction with an analysis of other comparable information, so that clients can compare their options and make informed decisions about their options with their existing retirement plans. No client is under any obligation to roll over retirement plan assets to an account managed by Kemp Financial.

Kemp Financial generally recommends that clients establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA-member broker-dealer, member SIPC, to maintain custody of clients' assets and to effect trades for their accounts. Although Kemp Financial generally recommends that clients establish accounts at Schwab, it is the client's decision to open one or more brokerage accounts 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 advisers on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the adviser'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 Schwab's 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 recommend alternative custodial broker-dealer options should the need arise.

All existing and prospective clients go through our four-step process prior to becoming a client. Our process includes, but is not limited to:

- 1) Get to know you
- 2) Client data gathering and education
- 3) Investment Policy Statement (IPS) presentation
- 4) Engage Kemp Financial

Our goal is to help our clients manage their financial assets and resources to support their current and future lifestyle objectives. Every client has a different set of values, financial resources, time horizon and lifestyle objective. These four factors are utilized to design a Legacy Action Plan or Client Action Plan as well as an Investment Policy Statement (IPS) personalized to their unique set of circumstances. Before becoming a client, each individual must go through our four-step process before engaging Kemp Financial. Implementation is completed after an IPS has been created and approved by each client. This document covers a client's resources, short, mid and long-range financial desires as well as tolerances for risk. In addition, each IPS contains a policy framework for investing a client's assets through our advisory service. Our process for asset allocation involves creating a portfolio based on the three primary asset classes: stocks, bonds and cash. Within these broad-based asset classes, we create a diversified portfolio by purchasing mutual funds and occasionally exchange traded funds ("ETF") that represent a wide range of sub-asset classes. For example, the stock portion of the portfolio may in part consist of US Large Cap, US Small Cap along with International Large and International Small cap stocks. Our management of these accounts and each client's underlying objectives is an ongoing process. We work to keep the client portfolios in alignment with their associated IPS. In addition, we seek to meet with our clients regularly to ensure or adjust to any changes in their desires, financial resources or life events that might lead towards a change in their IPS. Clients may from time to time impose restrictions on investing in certain types of securities or asset classes so long as such restrictions may reasonably be implemented by Kemp Financial.

For a minority of legacy client accounts, certain Third-Party Advisers have been engaged for the provision of select investment advisory services, such as retirement plan advisory services. This practice has been sunsetted for new clients and the majority of Kemp Financial's current clients. Recommendations for or selections of a particular Third-Party Adviser are typically made after gathering pertinent information from the client about the client's financial situation and investment objectives and are generally based upon the following factors: i) the individual preference of Kemp Financial's investment adviser representatives; ii) the client's risk tolerance, goals and objectives, as well as investment experience; and iii) the size of client assets available for investment. Any securities transactions executed through the Third-Party Adviser is in conjunction with the client's selected custodial broker-dealer. Third-Party Advisers generally charge additional advisory or administrative fees above and beyond fees charged by Kemp Financial. Any

additional costs are fully disclosed to the client and approved by the client in the Third-Party Adviser's agreement. These fees are also disclosed in the Third-Party Adviser's ADV Part 2.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code (the "Code"), as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- a. Meet a professional standard of care when making investment recommendations (give prudent advice)
- b. Never put our financial interests ahead of yours when making recommendations (give loyal advice)
- c. Avoid misleading statements about conflicts of interest, fees, and investments
- d. Follow policies and procedures designed to ensure that we give advice that is in your best interest
- e. Charge no more than is reasonable for our services; and
- f. Give you basic information about conflicts of interest.

Item 5 – Fees and Compensation

Kemp Financial charges its fees in advance and bills monthly thereafter based upon the value of the account at the close of each prior month. For all new accounts, monthly fees are prorated and paid at the time the management activity begins. Clients receive a refund for advanced advisory and administrative fees prorated to the date of termination upon closing of an account. Some clients have elected to pay management fees on a quarterly basis instead of monthly. For those clients, should a client terminate their relationship with Kemp Financial, clients would receive a refund for advanced advisory and administrative fees prorated to the date of termination.

Annual advisory and administrative fees generally range from .5% to 1.60% of the client's assets under Kemp Financial's management, depending on the size of the account and the services provided. The amount of the advisory and administrative fees, the services provided, the payment structure, termination provisions, and other aspects of each are detailed in the client agreement signed with the client.

As previously discussed, Third-Party Advisers are not utilized for the majority of client accounts and will not be utilized for new client accounts. For the few legacy accounts that do utilize Third-Party Advisers, such clients should be aware that Third-Party Advisers

generally charge administrative fees above and beyond fees charged by Kemp Financial. Any additional costs are fully disclosed to the client and approved by the client in the Third-Party Adviser's agreement. These additional fees generally range from .05% to .25%. From time to time and when appropriate for the client, Kemp Financial will recommend the use of mutual funds advised and/or administered by a Third-Party Adviser, which means that the Third-Party Adviser receives fees directly from such mutual funds. These fees and related fees are fully disclosed in the mutual fund prospectus and Third-Party Adviser's ADV Part 2. Under no circumstances does Kemp Financial share in the fees received by the Third-Party Advisers from their respective mutual funds. Third-Party Advisers typically provide services which include and are not limited to daily valuation with daily reconciliation, investment oversight, performance reports, billing, and assistance in trading and client portal access.

Neither Kemp Financial nor any of its supervised persons accepts compensation for the sale of securities or other investment products. For clients that do not utilize a Third-Party Adviser, Kemp Financial provides the administrative services that would otherwise be provided by such Third-Party Adviser and an investment advisory agreement is maintained between the client and Kemp Financial that describes what services are provided. For clients not utilizing a Third-Party Adviser, administrative fees are also assessed by Kemp Financial that are separate and in addition to the advisory fees charged by Kemp Financial. The client agreement discloses both the advisory fee and administrative fee. The advisory fees are consistent with the services discussed in this brochure. The administrative fees are strictly for non-discretionary trading, quarterly performance reporting, client portal maintenance, billing, cash-flow management, and regular rebalancing based upon the client's needs. As noted earlier, the advisory fees range from .5% to 1.35%; in addition, administrative fees range from .05% to .25%. Thus, total fees for clients not utilizing a Third-Party Adviser range from .5% to 1.60%.

Although the aggregate advisory and administrative fees that a client will pay are approximately the same regardless of whether the client has engaged the services of a Third-Party Adviser, a conflict of interest exists to the extent Kemp Financial recommends that a client not utilize a Third-Party Adviser because Kemp Financial will earn an administrative fee that would have otherwise been earned by a Third-Party Adviser. Kemp Financial addresses this conflict of interest by providing additional administrative services in consideration of the additional administrative fee that would otherwise be provided by a Third-Party Adviser. Furthermore, Kemp Financial makes full disclosure of its advisory and administrative fees both in this brochure and the advisory agreement to be signed by clients, makes recommendations that are in the client's best interests as a fiduciary, and

makes clients aware that they are under no obligation to retain Kemp Financial or any Third-Party Adviser.

In addition to the fees charged by Kemp Financial, clients will incur brokerage and other transaction costs. Please refer to Item 12: Brokerage Practices, for further information on such brokerage and other transaction-related practices. Clients will also typically incur additional fees and expenses imposed by independent and unaffiliated third-parties, which can include qualified custodian fees, mutual fund or ETF fees and expenses, mark-ups and mark-downs, spreads paid to market makers, wire transfer fees, check-writing fees, early-redemption charges, certain deferred sales charges on previously-purchased mutual funds, margin fees, charges or interest, IRA and qualified retirement plan fees, and other fees and taxes on brokerage accounts and securities transactions. These additional charges are separate and apart from the fees charged by Kemp Financial.

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

Kemp Financial 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 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 is typically \$500,000. 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, the 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. Past performance does not guarantee future returns.

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 of 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 need as determined by the client.

Like any investment strategy, adhering to an asset allocation strategy involves material risks. Such material risks are described in further detail below:

☐ Investing for the long term means that a client's account will be exposed to short-term fluctuations in the market and the behavioral impulse to make trading decisions based on such short-term market fluctuations. Kemp Financial generally does not condone short-term trading in an attempt to "time" the market, and instead coaches clients to remain committed to their financial goals. However, investing for the long term can expose clients to risks borne out of changes to interest rates, inflation, general economic conditions, market cycles, geopolitical shifts, pandemics, natural disasters and regulatory changes.

☐ Investing in mutual funds does not guarantee a return on investment, and shareholders of a mutual fund may lose the principal that they've invested into a particular mutual fund. Mutual funds invest in underlying securities that comprise the mutual fund, and as such clients are exposed to the risks arising from such underlying securities. Mutual funds charge internal expenses to their shareholders (which can include management fees, administration fees, shareholder servicing fees, sales loads, redemption fees, and other fund fees and expenses, e.g.), and such internal expenses subtract from its potential for market appreciation. Shares of mutual funds may only be traded at their stated net asset value ("NAV"), calculated at the end of each day upon the market's close. Clients are encouraged to carefully read the prospectus of any mutual fund to be purchased for investment to obtain a full understanding of its respective risks and costs.

☐ Investing in ETFs bears similar risks and incurs similar costs to investing in mutual funds as described above. However, shares of an ETF may be traded like stocks on the open market and are not redeemable at an NAV. As such, the value of an ETF may fluctuate throughout the day and investors will be subject to the cost associated with the bid-ask spread (the difference between the price a buyer is willing to pay (bid) for an ETF and the seller's offering (asking) price).

Kemp Financial retains the ability to utilize computer software programs provided by 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 its clients. However, margin may be used to satisfy a 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 margin-related expenses.

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 the firm or the integrity of its management. Kemp Financial has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Neither Kemp Financial nor its supervised persons are involved in other activities during normal business hours; however, certain associated persons of Kemp Financial are licensed as insurance agents and California Real Estate Brokers. This has the potential to create a conflict of interest to the extent a supervised person of Kemp Financial earns a commission on the sale of an insurance product or as part of a real estate transaction in addition to the advisory fees it earns for the management of clients' accounts. Kemp Financial attempts to mitigate this conflict of interest by disclosing the conflict to clients, and informing the clients that they are always free to purchase insurance products or engage in real estate transactions through other agents that are not affiliated with Kemp Financial, or to determine not to purchase the insurance product or real estate at all. Kemp Financial also attempts to mitigate the conflict of interest by requiring employees to read and acknowledge receipt of the firm's Code of Ethics, as well as to adhere to their individual fiduciary duty to the clients of Kemp Financial. It should be noted that insurance and real estate transactions reflect a very small dedication such supervised persons' time and, therefore, compensation. Robert Kemp is an Elder Board member for Richfield Community Church and President of Ocean Del Rey Community Association.

Neither Kemp Financial nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. Neither Kemp Financial nor any of its management persons are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Additional Compensation

Previously, Kemp Financial and its supervised persons recommended Third Party Advisers for certain account services. In doing so, Kemp Financial did not and does not receive any compensation directly from Third Party Advisers. However, some Third Party Advisers offer services that are intended to directly benefit Kemp Financial, clients, or both. Such services include (a) an online platform through which Kemp Financial can monitor and review client accounts, create model portfolios, and perform other client account maintenance matters, (b) access to technology that allows for client account aggregation, and (c) quarterly client statements. Kemp Financial attempts to mitigate this conflict by disclosing it to clients in this Form ADV and by requiring all supervised persons to follow its policies and procedures, which specifically note the fiduciary obligation to place client interests ahead of the individual representative's or Kemp Financial's. Fees for such programs may be higher or lower than if the client directly obtained services of the Third Party Adviser or if the client obtained advisory services separately.

As further described in Item 12 below, there are also services custodial broker-dealers 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 custodial broker-dealers benefits us but creates a conflict of interest in that we have an incentive to direct our clients towards the particular custodial broker-dealers that we receive these benefits from rather than a custodial broker-dealer that might provide the most favorable execution. We believe that the execution methods and pricing obtained from our recommended custodial broker-dealers 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

All supervised persons of Kemp Financial will place the needs and best interests of 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. If 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 considers several factors when recommending a custodial broker-dealer for client transactions and determining the reasonableness of such custodial broker-dealer's compensation. Such factors include the custodial broker-dealer's industry reputation and financial stability, service quality and responsiveness, execution price, speed and accuracy, reporting abilities, and general expertise. Assessing these factors allows Kemp Financial to fulfill its duty to seek the best execution for its clients' securities transactions. However, Kemp Financial does not guarantee that the custodial broker-dealer recommended for client transactions will necessarily provide the best possible price, as

price is not the sole factor considered when seeking best execution. After considering the factors above, the Adviser recommends Schwab as the custodial broker-dealer for client accounts.

Kemp Financial does not receive research and other soft dollar benefits in connection with client securities transactions, which are known as “soft dollar benefits”. However, the custodial broker-dealer(s) recommended by Kemp Financial do provide certain products and services that are intended to directly benefit Kemp Financial, clients, or both. Such products and services include (a) an online platform through which Kemp Financial can monitor and review client accounts, (b) access to proprietary technology that allows for order entry, (c) duplicate statements for client accounts and confirmations for client transactions, (d) invitations to the custodial broker-dealer(s)’ educational conferences at a discount, (e) practice management consulting, and (f) occasional business meals and entertainment.

Kemp Financial does not consider, in selecting or recommending custodial broker-dealers, whether it or a related person receives client referrals from a custodial broker-dealer or third-party. Kemp Financial does not routinely recommend, request, or require that a client direct it to execute transactions through a specified custodial broker-dealer. Kemp Financial does not aggregate the purchase or sale of securities for client accounts.

Item 13 – Review of Accounts

Client accounts are reviewed regularly by the client’s applicable investment adviser representative. In addition, reviews with Kemp Financial and the client are scheduled at regular intervals determined by the needs of the client. The schedules vary, but in general client adviser meetings are held every 3-4 months or bi-annual basis, but the meetings are never less than annual, unless waived by the client. More often than not, the adviser client meetings are determined by the clients’ schedules.

As discussed previously, Third-Party Advisers are not utilized for the majority of our current client accounts and will not be utilized for new client accounts. However, when working with the Third-Party Advisers, it should be noted that there are two levels of review for our client portfolios. The Third-Party Adviser reviews 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 Kemp Financial. In the event the portfolio is out of alignment to the model, a report would be generated for Kemp Financial to review the appropriateness of “rebalancing” the account to the model. The individual advisors at Kemp Financial 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 at 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.

If utilized for a particular client, the Third-Party Adviser will provide the 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 advisory fees for the quarter. In the event the client maintains taxable accounts, the Third-Party Adviser will 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 does not receive any compensation from non-clients for providing advisory services to clients. No compensation 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 the client's investment assets. Kemp Financial 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 Advisers may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For clients that do not have their fees deducted directly from their account(s) and have not provided Kemp Financial with any discretionary standing letters of authorization to distribute funds from their account(s), Kemp Financial will not have any custody of client funds or securities. For clients that have their fees deducted directly from their account(s) or that have provided Kemp Financial with discretion as to amount or timing of disbursements pursuant to a standing letter of authorization to disburse funds from their account(s), Kemp Financial will typically be deemed to have limited custody over such clients' funds or securities pursuant to the SEC's custody rule and subsequent guidance

thereto. 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 as described in Item 12, above.

Item 16 – Investment Discretion

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

Investment guidelines and restrictions placed by clients must be provided to Kemp Financial 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 their financial condition. Kemp Financial 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 2 B - Update Dated March 5, 2024

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 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.

Additional information about Robert Kemp is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2- Educational Background and Business Experience

Robert J. Kemp born 1965

Post-Secondary Education:

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

Business Background:

09/96 to Present: Financial Adviser, Kemp Financial Management, LLC, Fullerton, CA

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

Robert Kemp is licensed as a California Life and Casualty insurance agent. He reviews insurance needs for our clients as part of our advisory business.

Robert Kemp is currently licensed as a California Real Estate Broker known as Kemp Realty. He currently uses this license to buy and sell real estate for his 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.

Robert Kemp is acting as President of his HOA, Ocean Del Rey Community Association participating in meetings outside of work hours.

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, CPAs, attorneys, 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 the investment advisory activities within the firm.

KEMP Financial Management, LLC



ADV 2 B - Update Dated March 5, 2024

This Brochure Supplement provides information about Lissa Clarke 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 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.

Additional information about Lissa Clarke is available on the SEC's website at www.adviserinfo.sec.gov.

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Item 2- Educational Background and Business Experience

Melissa (Lissa) L. Clarke born 1964

Business Background:

04/11 to Present: Financial Adviser, Kemp Financial Management, LLC, Fullerton, CA

05/11 to 09/17: Registered Representative, SagePoint Financial Advisors, Inc.,
Phoenix, AZ

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

Lissa Clarke is licensed as a California Life and Casualty insurance agent. She reviews insurance needs for clients as part of our advisory business.

Lissa Clarke is a California Notary Public. She performs notarial acts for clients during business hours at no charge.

Item 5- Additional Compensation

Lissa Clarke does not receive any additional compensation from any outside business activities, mutual funds, publicly traded companies, custodians, banks, CPAs, attorneys, referrals or professional organizations.

Item 6- Supervision

Lissa Clarke is supervised by the Chief Compliance Officer, Robert J. Kemp, at Kemp Financial Management, LLC and can be reached at 714-257-0800. Mr. Kemp has the responsibility of supervision over all of the investment advisory activities within the firm. Supervision is conducted through the monitoring of e-mail and other correspondence, pre-review of marketing or sales material, frequent meetings, and other management-level discussions.

KEMP Financial Management, LLC



ADV 2 B - Update Dated March 5, 2024

This Brochure Supplement provides information about Wyatt Kiedrowski 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 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.

Additional information about Wyatt Kiedrowski is available on the SEC's website at www.adviserinfo.sec.gov.

2286 N. State College Blvd., Fullerton, CA 92831
(714)257-0800 www.kempfm.com

Item 2- Educational Background and Business Experience

Wyatt Kiedrowski born 1986

Post-Secondary Education:

California State University, Fullerton, Fullerton, CA, B.S. Physics, 2011

Business Background:

05/19 to Present: VP, Operations, Kemp Financial Management, LLC, Fullerton, CA

08/12 to 05/19: Client Communication Specialist, Kemp Financial Management, LLC, Fullerton, CA

06/10 to 08/12: Intern, Kemp Financial Management, LLC, Fullerton, CA

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

Wyatt Kiedrowski is not engaged in any outside business activities.

Item 5- Additional Compensation

Wyatt Kiedrowski does not receive any additional compensation from any outside business activities, mutual funds, publicly traded companies, custodians, banks, CPAs, attorneys, referrals or professional organizations.

Item 6- Supervision

Wyatt Kiedrowski is supervised by the Chief Compliance Officer, Robert J. Kemp, at Kemp Financial Management, LLC and can be reached at 714-257-0800. Mr. Kemp has the responsibility of supervision over all of the investment advisory activities within the firm. Supervision is conducted through the monitoring of e-mail and other correspondence, pre-review of marketing or sales material, frequent meetings, and other management-level discussions.

KEMP Financial Management, LLC



ADV 2 B - Update Dated March 5, 2024

This Brochure Supplement provides information about Lauren Zuniga 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 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.

Additional information about Lauren Zuniga is available on the SEC's website at www.adviserinfo.sec.gov.

2286 N. State College Blvd., Fullerton, CA 92831
(714)257-0800 www.kempfm.com

Item 2- Educational Background and Business Experience

Lauren Zuniga born 1993

Post-Secondary Education:

California State University, Fullerton, Fullerton, CA B.S. Business Management, 2016

Business Background:

04/22 to Present: Financial Advisor Kemp Financial Management, LLC, Fullerton, CA

1/19 to 4/22: Account Manager, Independent Financial Group, LLC, San Diego, CA

8/16 to 1/19: Account Manager, SagePoint Financial Advisors, Inc., Phoenix, AZ

Professional Designations:

CERTIFIED FINANCIAL PLANNER™ professional

I am certified for financial planning services in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board"). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and CFP Board's other certification marks (the "CFP Board Certification Marks"). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.CFP.net.

CFP® professionals have met CFP Board's high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor's degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirement through other qualifying credentials. CFP Board implemented the bachelor's degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor's or higher degree or completed a financial planning development capstone course.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual's ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.

- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with CFP Board’s Code and Standards. This includes a commitment to CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

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

Lauren Zuniga is not engaged in any outside business activities.

Item 5- Additional Compensation

Lauren Zuniga does not receive any additional compensation from any outside business activities, mutual funds, publicly traded companies, custodians, banks, CPAs, attorneys, referrals or professional organizations.

Item 6- Supervision

Lauren Zuniga is supervised by the Chief Compliance Officer, Robert J. Kemp, at Kemp Financial Management, LLC and can be reached at 714-257-0800. Mr. Kemp has the responsibility of supervision over all of the investment advisory activities within the firm. Supervision is conducted through the monitoring of e-mail and other correspondence, pre-

review of marketing or sales material, frequent meetings, and other management-level discussions.