

# **KeyHouse Analytics Inc**

## **ADV - PART 2A (FIRM BROCHURE)**

### **Principal Business Office Address:**

1800 2nd Street, Suite 797

Sarasota, FL 34236

**Brochure Date: April 26, 2018**

This firm brochure ("Brochure") provides information about the qualifications and business practices of KeyHouse Analytics Inc.,(KHA). If you have any questions about the contents of this Brochure, please contact us at (941) 735-0049. 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 KHA is also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

KHA is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training.

### *Item 2 Summary of Material Changes*

Form ADV Part 2 requires registered investment advisers to amend their brochure when information becomes materially inaccurate. If there are any material changes to an adviser's disclosure brochure, the adviser is required to notify you and provide you with a description of the material changes.

This is the first filing of KHA there are no material changes to report.

### Item 3 Table of Contents

|   |         |
|---|---------|
| Item 1 Cover Page   | Page 1  |
| Item 2 Summary of Material Changes  | Page 2  |
| Item 3 Table of Contents  | Page 3  |
| Item 4 Advisory Business  | Page 4  |
| Item 5 Fees and Compensation  | Page 4  |
| Item 6 Performance-Based Fees and Side-By-Side Management                                     | Page 5  |
| Item 7 Types of Clients   | Page 5  |
| Item 8 Methods of Analysis, Investment Strategies and Risk of Loss                            | Page 5  |
| Item 9 Disciplinary Information   | Page 6  |
| Item 10 Other Financial Industry Activities and Affiliations                                  | Page 6  |
| Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading | Page 7  |
| Item 12 Brokerage Practices   | Page 8  |
| Item 13 Review of Accounts  | Page 9  |
| Item 14 Client Referrals and Other Compensation   | Page 9  |
| Item 15 Custody   | Page 9  |
| Item 16 Investment Discretion   | Page 9  |
| Item 17 Voting Client Securities  | Page 9  |
| Item 18 Financial Information   | Page 9  |
| Item 19 Requirements for State-Registered Advisers  | Page 10 |
| Item 20 Additional Information  | Page 10 |

## **Item 4 Advisory Business**

### **Section A. THE COMPANY**

KeyHouse Analytics Inc.,("KHA" or "the Firm" or "we") is organized as an S Corporation under the laws of the state of Florida and is registered as an independent investment adviser and is based in Sarasota, Florida. KHA was established on April 5, 2017.

### **OWNERSHIP**

KHA is solely owned by Kip David Schoonover.

### **Section B. TYPES OF ADVISORY SERVICES**

KHA provides discretionary investment advisory services regarding securities to individuals, businesses.

### **Section C. OVERVIEW OF ADVISORY SERVICES**

#### **Advisory Services**

Investment advice is not tailored to each individual client. Portfolio management is uniform among all clients in that the investment philosophy of KHA, which is to own a portfolio of 15 to 20 American growth companies chosen with an emphasis on minimizing risk using a discipline of only buying companies involved in a long-term trend, having earnings growth more than 8%, generating free cash flow and purchased at a reasonable valuation. Portfolios will vary based on the dollar amount of each client's portfolio.

### **Section D. WRAP FEE PROGRAMS**

KHA does not participate in wrap fee programs.

### **Section E. ASSETS UNDER MANAGEMENT**

As of April 26, 2018 KHA has no assets under management.

## **Item 5 Fees and Compensation**

#### ***Billing.***

Fee schedule is charged at 1% annually or ½% each six months on assets under \$1 million. .7% on assets above \$1 million or .35% each six months. Payment of management fee is based upon client complete satisfaction.

- A. Clients may choose to have management fees deducted from their managed accounts or can be billed for fees incurred. Clients are billed each six month of service in arrears and are never obligated to pay the management fee unless they are satisfied with the performance.
- B. Clients will incur brokerage costs per transaction from trading activity in their account. The transaction fees are \$4.95 per trade and turnover is less than 20% of 15 to 20 stocks. Information is provided in the brochure under Fees and Logistics.
- C. Clients never pay management fees in advance.
- D. KeyHouse Analytics does not except compensation for the sale of securities or any investment products.

### ***Compensation for the Sale of Securities or Other Investment Products***

KHA does not sell any investment products.

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

KHA is not compensated with fees based on a share of capital gains on or capital appreciation of the assets of a Client, otherwise known as Performance-Based Fees.

## **Item 7 Types of Clients**

- High net worth individuals
- Individuals
- Family entities
- Foundations
- Trusts
- Charitable institutions
- Businesses and other Corporate Entities

KHA has no minimums for investment service.

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

A portfolio of 15 to 20 publicly traded companies are chosen to minimize risk using a discipline which is to only buy companies that are participating in a long-term trend, can be purchased at a reasonable valuation relative to its earnings growth and produces excess cash flow.

- A. The potential of loss is present however is mitigated by following this strategy of a diverse portfolio of 15 to 20 companies. Investing in the stock market can produce losses which may not recover. 5.

- B. The strategy of investing used by KeyHouse Analytics Inc. does not involve any unusual or errant risk greater than the general stock market itself. Frequent trading is not a practice of KeyHouse Analytics Inc. Portfolio turnover is less than 20 percent per year.
- C. The KHA portfolio consists of small cap mid cap and large cap American growth equities. We do not recommend any particular type of security other than US based equities.

## Item 9 Disciplinary Information

There are no legal or disciplinary events that are material to a Client's or prospective Client's evaluation of KHA's advisory business or the integrity of our management.

## Item 10 Other Financial Industry Activities and Affiliations

### Section A.

#### **BROKER-DEALER**

No management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

### Section B.

#### **COMMODITY POOL OPERATOR AND COMMODITY TRADING ADVISER**

Neither KHA nor any of its management persons is registered or has an application pending to register as a Future's Commission Merchant, Commodity Pool Operator or Commodity Trading Advisor or associated person.

### Section C.

#### **OTHER RELATIONSHIPS AND/OR ARRANGEMENTS MATERIAL TO ADVISORY BUSINESS**

Neither KHA nor its management has any relationship or arrangement with related persons that is material to its advisory business or to Clients.

### Section D.

#### **SELECTION OF OTHER INVESTMENT ADVISERS**

NA

## **Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

### **CODE OF ETHICS**

Pursuant to SEC Rule 204A-1, KHA has adopted a written Code of Ethics ("Code") that sets forth standards of conduct and federal securities law requirements applicable to all supervised persons as defined in the Advisers Act. All employees review and acknowledge reviewing the Code annually. Code violations may result in disciplinary action or dismissal. KHA will provide a copy of its Code to any client or prospective Client upon request. Please contact KHA at the address or phone number listed on the face of this Brochure to request a copy.

### **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

KHA may act as investment manager to numerous Clients. KHA may give advice and take action with respect to any accounts it manages that may differ from action taken by KHA on behalf of other accounts. KHA is not obligated to recommend for purchase or sale or to refrain from recommending for purchase or sale any security that KHA or its access persons, as defined by rules under the Advisers Act and the 1940 Act, may buy or sell for their own accounts or for the accounts of any other Client. KHA is not obligated to refrain from investing in securities held by accounts that it manages except to the extent that such investments violate the Code adopted by KHA.

### **Restrictions on Personal Securities Transactions**

To address the conflicts of interest that arise with the personal trading of KHA employees, the Code prohibits certain types of personal securities transactions. This policy specifies certain permitted personal investments and establishes reporting and preclearance requirements and enforcement procedures. The Code also includes guidelines relating to insider trading and gifts. Employees are permitted to buy and sell the same securities that are held in Client accounts only if the trades occur at the same time or after the trades for Clients. Employees must submit their brokerage statements quarterly to the Compliance Officer for review and archiving. Employees may purchase and sell securities for their own accounts that have also been recommended to Clients. The Code is designed to assure that the personal securities transactions and interests of the employees will not interfere with making decisions in the best interest of Clients. Nonetheless, because the Code permits employees to invest in the same securities as Clients, there is a possibility that employees might benefit from market activity by a Client.

### **Disclosure of Personal Investments**

KHA principals and employees may maintain personal brokerage accounts subject to the firm's Code. Access persons as defined under the Advisers Act are required to provide a quarterly report to the Chief Compliance Officer, or other designated person, showing investment transactions in their personal accounts, as well as disclosing annually all securities held on their behalf.

## Item 12 Brokerage Practices

KHA seeks to select a custodian or broker that will hold Client assets and execute transactions on terms that are, overall, most advantageous when compared to other available providers and their services. In this effort, we periodically evaluate our primary custodian/broker to ensure that the overall relationship is satisfying certain key criteria, including:

- Reasonableness of transaction fees and charges
- Timeliness of execution and settlement
- Timeliness and accuracy of trade confirmations
- Client reporting capability
- Custody services provided
- Financial condition
- Business reputation

KHA Clients will utilize Charles Schwab, Inc. ("CS") for custody of assets and execution of transactions. Charles Schwab is a member of the New York Stock Exchange and the Securities Investor Protection Corporation, acts as the clearing agent in the execution of securities transactions placed through CS.

KHA does not receive or participate in soft dollars nor use client commissions to obtain research reports or products or services. All client assets are managed through the custodian Charles Schwab.

KHA does not receive referrals from the broker dealer.

The transaction cost through CS are market competitive as one the the lowest costs available for trading.

KHA does not permit the client to direct the brokerage location as KHA only works through CS.

Purchases made for client accounts are done so in a block trade and allocated to each client account. There is no cost difference to the client whether a block trade and allocation is executed or whether trades are made individually.



## **Item 13 Review of Accounts**

### **PORTFOLIO REVIEWS**

Client accounts and portfolios are periodically reviewed as it deems appropriate in its judgment depending upon the account needs and conditions of each market. KHA reviews Client portfolios on an ongoing basis to ensure that investment allocations are aligned with each Client's individual circumstances and are consistent with our assessment of market conditions; change of security positions; request by a Client for a meeting; or changes in a Client's investment objective or policies. Performance of accounts in connection with objectives, security positions and other investment opportunities, commitment to any one industry and commitment to any one security are among the matters that may be discussed.

### **CLIENT REPORTS**

Clients receive statements monthly from CS. These statements will provide pertinent information with regard to a Client's account(s), including but not limited to, account values, net contributions and withdrawals. Clients receive performance reports from KHA each 6 months along with a bill for service. Clients may request performance reports at any time.

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

KHA does not receive any economic benefits other than fees paid to the firm by its Clients. KHA do not receive any economic benefits from any third parties with respect to the advisory services offered to Clients.

## **Item 15 Custody**

KHA does not have custody of client funds.

## **Item 16 Investment Discretion**

KHA has investment discretion in client accounts and generally will not have restrictions placed upon it by the client regarding trading. KHA can not withdraw funds on a client's behalf unless paperwork through the custodian has been granted and the direction of the withdrawal is to an additional specific account designated by the client. The assumption of authority is assumed through the signing of a limited power of attorney provided from and executed by CS.

## **Item 17 Voting Client Securities**

KHA does not on behalf of Clients vote proxies or provide advice with regard to any proxies solicited by the issuers of securities in which assets of an account are managed by KHA or held in a client account during the related designated investment period.

## **Item 18 Financial Information**

KHA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to Clients and has not been the subject of any bankruptcy proceeding.

## Item 19 Requirements for State-Registered Advisers

Refer to the Part(s) 2B for background information about management personnel and those giving advice on behalf of our firm.

Our firm is not actively engaged in any business other than giving investment advice.

Neither our firm, nor any persons associated with our firm are compensated for advisory services with performance-based fees. Please refer to the *Performance-Based Fees and Side-By-Side Management* section above for additional information on this topic.

Neither our firm, nor any of our management persons have any reportable arbitration claims, civil, selfregulatory organization proceedings or administrative proceedings.

Neither our firm, nor any of our management persons have a material relationship or arrangement with any issuer of securities.

## Item 20 Additional Information

### Your Privacy

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any nonpublic personal information about you to any nonaffiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to nonpublic personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your nonpublic personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Contact our main office at the telephone number on the cover page of this brochure if you have any questions regarding this policy.

### Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

**Class Action Lawsuits**

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

## **Kip David Schoonover**

**KeyHouse Analytics Inc.  
1800 2<sup>nd</sup> Street Suite 797  
Sarasota, FL 34236**

**Telephone: 941-735-0049**

**April 26, 2018**

### **FORM ADV PART 2B BROCHURE SUPPLEMENT**

This brochure supplement provides information about Kip David Schoonover that supplements the KHA KeyHouse Analytics Inc. brochure. You should have received a copy of that brochure. Contact us at 941-735-0049 if you did not receive KeyHouse Analytics Inc. brochure or if you have any questions about the contents of this supplement.

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

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

### **Kip Schoonover**

*Year of Birth:* 1964

*Education After High School and work history:*

- 2 years at the new School for Social Research and Parsons school of Design
- 25 years as an investment advisor with J.L Bainbridge 1991 to 2016

## **Item 3 Disciplinary Information**

Mr. Schoonover does not have any reportable disciplinary disclosure.

## **Item 4 Other Business Activities**

In addition to serving as your investment advisory representative, Kip Schoonover is engaged in the following activities:

- Board member of the Sarasota Selby Library

## **Item 5 Additional Compensation**

Kip David Schoonover does not receive any additional compensation for providing advisory services beyond that received as president and CEO of KeyHouse Analytics Inc., a Registered Investment Adviser.

## **Item 6 Supervision**

As the President/CEO/CCO of KeyHouse Analytics Inc., Kip David Schoonover supervises the advisory activities of our firm. Mr. Schoonover can be reached at 941-735-0049.

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

Kip Schoonover does not have any reportable arbitration claims, has not been found liable in a reportable civil, self-regulatory organization or administrative proceeding, and has not been the subject of a bankruptcy petition.