

Whitetip Capital LLC

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Whitetip Capital LLC. If you have any questions about the contents of this brochure, please contact us at (281) 674-4059 or by email at: rreis@kensingtonwealthllc.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 Whitetip Capital LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Whitetip Capital LLC's CRD number is: 168266.

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Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

There are no material changes in this brochure from the last annual updating amendment of Whitetip Capital LLC on March 13, 2019. Material changes relate Whitetip Capital LLC's policies, practices or conflicts of interests.

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Item 4: Advisory Business

A. Description of the Advisory Firm

Whitetip Capital LLC (hereinafter “WTC”) is a Limited Liability Company. The firm was formed in August 2008, and the principal owner is Robert John Reis.

B. Types of Advisory Services

Portfolio Management Services

WTC offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. WTC creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels). Portfolio management services include, but are not limited to, the following:

- | | |
|-----------------------|--------------------------------|
| • Investment strategy | • Personal investment policy |
| • Asset allocation | • Asset selection |
| • Risk tolerance | • Regular portfolio monitoring |

WTC seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of WTC’s economic, investment or other financial interests. To meet its fiduciary obligations, WTC attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, WTC’s policy is to seek fair and equitable allocation of investment opportunities/transactions among its clients to avoid favoring one client over another over time. It is WTC’s policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent among its clients on a fair and equitable basis over time.

Subadvisor Services

WTC may also act as a subadvisor to advisers unaffiliated with WTC. These third-party advisers would outsource portfolio management services to WTC. This relationship will be memorialized in each contract between WTC and the third-party adviser.

Services Limited to Specific Types of Investments

WTC generally limits its investment advice to mutual funds, although WTC primarily recommends high yield mutual funds to a majority of its clients. WTC may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

WTC offers the same suite of services to all of its clients. However, WTC evaluates the investments of each client with respect to their goals, risk tolerance levels and time horizon and tailors specific client investment strategies on that basis. Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs; however, investments will be made in accordance with the risk tolerance set forth in the client's Investment Policy Statement.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. WTC does not participate in any wrap fee programs.

E. Assets Under Management

WTC has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$ 263,000,000	\$0.00	December 2019

WTC currently has \$293,000,000 in assets under advisement.

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
\$100,000 - AND UP	2.00%

WTC uses the value of the account as of the last business day of the billing period, after taking into account deposits and withdrawals, for purposes of determining the market value of the assets upon which the advisory fee is based.

These fees are non-negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Clients may terminate the agreement without penalty for a full refund of WTC's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

Subadviser Services Fees

WTC may also act as a subadviser to unaffiliated third-party advisers.

Total Assets Under Management	Annual Fees
\$100,000 - AND UP	2.00%

The fees are negotiable and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for subadviser services will depend on the specific third-party investment adviser engaging WTC as subadviser.

B. Payment of Fees

Payment of Portfolio Management Fees

Asset-based portfolio management fees are withdrawn directly from the client's accounts with client's written authorization on a monthly basis. Fees are paid in arrears.

Payment of Subadviser Fees

Subadviser fees may be withdrawn from clients' accounts or clients may be invoiced for such fees, as disclosed in each contract between WTC and the applicable third-party adviser.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by WTC. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

WTC collects its fees in arrears. It does not collect fees in advance.

E. Outside Compensation For the Sale of Securities to Clients

Neither WTC nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

WTC does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

WTC generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals
- ❖ Investment Companies
- ❖ Other Investment Advisers

There is an account minimum of \$100,000, which may be waived by WTC in its discretion.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis & Investment Strategies

WTC's methods of analysis include Quantitative analysis.

Quantitative analysis deals with measurable factors as distinguished from qualitative considerations such as the character of management or the state of employee morale, such as the value of assets, the cost of capital, historical projections of sales, and so on.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis & Investment Strategies

Quantitative analysis Investment strategies using quantitative models may perform differently than expected as a result of, among other things, the factors used in the models, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction and implementation of the models.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature. Please also see discussion of mutual funds in Item 12 below.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither WTC nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither WTC nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Jonathan Scott Solo operates an investment company or another pooled investment vehicle. From time to time, he will offer clients advice or products from this activity. Whitetip Capital LLC always acts in the best interest of the client.

Jonathan Scott Solo is an investment adviser representative with another firm. From time to time, he will offer clients advice or products from this activity. Whitetip Capital LLC always acts in the best interest of the client. Clients are in no way required to utilize the services of any representative of Whitetip Capital LLC in such individual's outside capacity.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

WTC does not utilize nor select third-party investment advisers. All assets are managed by WTC management.

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

A. Code of Ethics

WTC has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. WTC's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

WTC does not recommend that clients buy or sell any security in which a related person to WTC or WTC has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of WTC may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of

WTC to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. WTC will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of WTC may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of WTC to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, WTC will never engage in trading that operates to the client's disadvantage if representatives of WTC buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

Custodians/broker-dealers will be recommended based on WTC's duty to seek "best execution," which is the obligation to seek execution of securities transactions for a client on the most favorable terms for the client under the circumstances. Clients will not necessarily pay the lowest commission or commission equivalent, and WTC may also consider the market expertise and research access provided by the broker-dealer/custodian, including but not limited to access to written research, oral communication with analysts, admittance to research conferences and other resources provided by the brokers that may aid in WTC's research efforts. WTC will never charge a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

Regarding best execution, WTC focuses on mutual fund performance with regard to the model's signals and the internal mutual fund management fees when selecting an instrument for a client. On occasion, other share classes may be available with lower costs and thus a client may pay higher charges depending on a particular mutual fund or mutual fund family and/or share classes, which can result in losses or gains depending on market and economic conditions.

Client accounts pay no "sales load" charge when entering mutual funds. In some cases, depending on custodians, a transaction charge may apply. WTC does not receive 12b-1 fees, transactions charges, rebates or soft dollar credits derived from any client accounts. Depending on custodians some clients may incur transactions fees or 12b-1 fees where other clients at other custodians will not, which may result in lower or higher returns or losses depending on market and economic conditions.

WTC recommends Pershing Advisor Solutions LLC.

1. Research and Other Soft-Dollar Benefits

WTC receives no research, product, or services other than execution from broker-dealers or custodians in connection with client securities transactions ("soft dollar benefits").

2. Brokerage for Client Referrals

WTC receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

WTC may permit clients to direct it to execute transactions through a specified broker-dealer. If a client directs brokerage, then the client will be required to acknowledge in writing that the client's direction with respect to the use of brokers supersedes any authority granted to WTC to select brokers; this direction may result in higher commissions, which may result in a disparity between free and directed accounts; and trades for the client and other directed accounts may be executed after trades for free accounts, which may result in less favorable prices, particularly for illiquid securities or during volatile market conditions. Not all investment advisers allow their clients to direct brokerage.

B. Aggregating (Block) Trading for Multiple Client Accounts

WTC does not aggregate or bunch the securities to be purchased or sold for multiple clients. This may result in less favorable prices, particularly for illiquid securities or during volatile market conditions.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Reviews

All client accounts for WTC's advisory services provided on an ongoing basis are reviewed at least monthly by Robert J Reis, owner, with regard to clients' respective investment policies and risk tolerance levels. All accounts at WTC are assigned to this reviewer.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

C. Content and Frequency of Regular Reports Provided to Clients

Each client of WTC's advisory services provided on an ongoing basis will receive a monthly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. WTC will also provide at least quarterly a separate written statement to the client.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

WTC receives compensation via its arrangement with its underlying subadvisers, but otherwise does not receive any economic benefit from any other third party for advice rendered to WTC's clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

WTC does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

Item 15: Custody

When advisory fees are deducted directly from client accounts at client's custodian, WTC will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16: Investment Discretion

WTC provides discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, WTC generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell,

when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share.

Item 17: Voting Client Securities (Proxy Voting)

WTC will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

WTC neither requires nor solicits prepayment of more than \$1,200 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither WTC nor its management has any financial condition that is likely to reasonably impair WTC's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

WTC has not been the subject of a bankruptcy petition in the last ten years.