KDM Capital LLC
Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of KDM Capital LLC. If you have any questions about the contents of this brochure, please contact us at (917) 825-1536 or by email at:ylia.rosario@gmail.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 KDM Capital LLC is also available on the SEC's website at www.adviserinfo.sec.gov. KDM Capital LLC's CRD number is: 285763.

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

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Item 2: Material Changes

KDM Capital LLC has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore there are no material changes to report.

Item 3: Table of Contents

Item 1: Cover Page

Item 2: Material Changes ii

Item 3: Table of Contents iii

Item 4: Advisory Business 2

A. Description of the Advisory Firm 2

B. Types of Advisory Services 2

C. Client Tailored Services and Client Imposed Restrictions 3

D. Wrap Fee Programs 3

E. Assets Under Management 3

Item 5: Fees and Compensation 3

A. Fee Schedule 3

B. Payment of Fees 4

C. Client Responsibility For Third Party Fees 4

D. Prepayment of Fees 4

E. Outside Compensation For the Sale of Securities to Clients 4

Item 6: Performance-Based Fees and Side-By-Side Management 4

Item 7: Types of Clients 5

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss 5

A. Methods of Analysis and Investment Strategies 5

B. Material Risks Involved 5

C. Risks of Specific Securities Utilized 6

Item 9: Disciplinary Information 8

A. Criminal or Civil Actions 8

B. Administrative Proceedings 8

C. Self-regulatory Organization (SRO) Proceedings 8

Item 10: Other Financial Industry Activities and Affiliations 9

A. Registration as a Broker/Dealer or Broker/Dealer Representative 9

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor 9

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests 9

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections 9

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading 9

A. Code of Ethics 9

B. Recommendations Involving Material Financial Interests 10

C. Investing Personal Money in the Same Securities as Clients 10

D. Trading Securities At/Around the Same Time as Clients' Securities 10
Item 12: Brokerage Practices....10
A. Factors Used to Select Custodians and/or Broker/Dealers 10
1. Research and Other Soft-Dollar Benefits 11
2. Brokerage for Client Referrals 11
3. Clients Directing Which Broker/Dealer/Custodian to Use 11
B. Aggregating (Block) Trading for Multiple Client Accounts 11
Item 13: Review of Accounts 12
A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews 12
B. Factors That Will Trigger a Non-Periodic Review of Client Accounts 12
C. Content and Frequency of Regular Reports Provided to Clients 12
Item 14: Client Referrals and Other Compensation 12
A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes) 12
B. Compensation to Non – Advisory Personnel for Client Referrals 12
Item 15: Custody 13
Item 16: Investment Discretion 13
Item 17: Voting Client Securities (Proxy Voting) 13
Item 18: Financial Information 13
A. Balance Sheet 13
B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients 13
C. Bankruptcy Petitions in Previous Ten Years 14
Item 19: Requirements For State Registered Advisers 14
A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background 14
B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any) 14
C. Calculation of Performance-Based Fees and Degree of Risk to Clients 14
D. Material Disciplinary Disclosures for Management Persons of this Firm 14
E. Material Relationships That Management Persons Have With Issuers of Securities (If Any) 14

Item 4: Advisory Business

A. Description of the Advisory Firm

KDM Capital LLC (hereinafter "KDM") is a Limited Liability Company organized in the State of New York. The firm was formed in September 2016, and the principal owner is Andre Lamar McClure.

B. Types of Advisory Services

Portfolio Management Services

KDM offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. KDM creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan to aid in the selection of a portfolio that matches each client's specific situation. Portfolio management services include, but are not limited to, the following:

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

KDM evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. KDM will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

KDM seeks to provide that investment decisions are made in accordance with the fiduciary duties owed to its accounts and without consideration of KDM's economic, investment or other financial interests. To meet its fiduciary obligations, KDM attempts to avoid, among other things, investment or trading practices that systematically advantage or disadvantage certain client portfolios, and accordingly, KDM'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 KDM's policy to allocate investment opportunities and transactions it identifies as being appropriate and prudent, including initial public offerings ("IPOs") and other investment opportunities that might have a limited supply, among its clients on a fair and equitable basis over time.

Services Limited to Specific Types of Investments

KDM generally limits its investment advice to mutual funds, fixed income securities, real estate funds (including REITs), insurance products including annuities, equities, hedge

funds, private equity funds, ETFs, treasury inflation protected/inflation linked bonds, commodities, non-U.S. securities, venture capital funds and private placements, although KDM primarily recommends long term growth. KDM may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

KDM will tailor a program for each individual client. This will include an interview session to get to know the client's specific needs and requirements as well as a plan that will be executed by KDM on behalf of the client. KDM may use model allocations together with a specific set of recommendations for each client based on their personal restrictions, needs, and targets. Clients may impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs. However, if the restrictions prevent KDM from properly servicing the client account, or if the restrictions would require KDM to deviate from its standard suite of services, KDM reserves the right to end the relationship.

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. KDM does not participate in any wrap fee programs.

E. Assets Under Management

KDM has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
$33,228,004.00	$0.00	December 2020

Item 5: Fees and Compensation

A. Fee Schedule

Portfolio Management Fees

Total Assets Under Management	Annual Fees
All Assets	1.50%

The advisory fee is calculated using the value of the assets on the last business day of the prior billing period.

These fees are generally 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 KDM's fees within five business days of signing the Investment Advisory Contract. Thereafter, clients may terminate the Investment Advisory Contract immediately upon written notice.

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 quarterly basis. Fees are paid in advance.

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 KDM. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

KDM collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check, or return deposit back into the client's account.

For all asset-based fees paid in advance, the fee refunded will be equal to the balance of the fees collected in advance minus the daily rate* times the number of days elapsed in the billing period up to and including the day of termination. (*The daily rate is calculated by dividing the annual asset-based fee rate by 365.)

E. Outside Compensation For the Sale of Securities to Clients

Neither KDM nor its supervised persons accept any compensation for the sale of 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

KDM 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

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

- Individuals
- High-Net-Worth Individuals

There is an account minimum of $50,000, which may be waived by KDM in its discretion.

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

A. Methods of Analysis and Investment Strategies

Methods of Analysis

KDM's methods of analysis include Fundamental analysis and Modern portfolio theory.

Fundamental analysis involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Modern portfolio theory is a theory of investment that attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, each by carefully choosing the proportions of various asset.

Investment Strategies

KDM uses long term trading and short term trading.

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

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Modern portfolio theory assumes that investors are risk averse, meaning that given two portfolios that offer the same expected return, investors will prefer the less risky one. Thus, an investor will take on increased risk only if compensated by higher expected

returns. Conversely, an investor who wants higher expected returns must accept more risk. The exact trade-off will be the same for all investors, but different investors will evaluate the trade-off differently based on individual risk aversion characteristics. The implication is that a rational investor will not invest in a portfolio if a second portfolio exists with a more favorable risk-expected return profile – i.e., if for that level of risk an alternative portfolio exists which has better expected returns.

Investment Strategies

Long term trading is designed to capture market rates of both return and risk. Due to its nature, the long-term investment strategy can expose clients to various types of risk that will typically surface at various intervals during the time the client owns the investments. These risks include but are not limited to inflation (purchasing power) risk, interest rate risk, economic risk, market risk, and political/regulatory risk.

Selection of Other Advisers: KDM's selection process cannot ensure that money managers will perform as desired and KDM will have no control over the day-to-day operations of any of its selected money managers. KDM would not necessarily be aware of certain activities at the underlying money manager level, including without limitation a money manager's engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

Short term trading risks include liquidity, economic stability, and inflation, in addition to the long term trading risks listed above. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

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 (leaving aside Treasury Inflation Protected/Inflation Linked Bonds) 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.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Fixed income investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.

Exchange Traded Funds (ETFs): An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest and the possibility of inadequate regulatory compliance.

Real estate funds (including REITs) face several kinds of risk that are inherent in the real estate sector, which historically has experienced significant fluctuations and cycles in performance. Revenues and cash flows may be adversely affected by: changes in local real estate market conditions due to changes in national or local economic conditions or changes in local property market characteristics; competition from other properties offering the same or similar services; changes in interest rates and in the state of the debt and equity credit markets; the ongoing need for capital improvements; changes in real estate tax rates and other operating expenses; adverse changes in governmental rules and fiscal policies; adverse changes in zoning laws; the impact of present or future environmental legislation and compliance with environmental laws.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Hedge funds often engage in leveraging and other speculative investment practices that may increase the risk of loss; can be highly illiquid; are not required to provide periodic pricing or valuation information to investors; May involve complex tax structures and delays in distributing important tax information; are not subject to the same regulatory

requirements as mutual funds; and often charge high fees. In addition, hedge funds may invest in risky securities and engage in risky strategies.

Private equity funds carry certain risks. Capital calls will be made on short notice, and the failure to meet capital calls can result in significant adverse consequences, including but not limited to a total loss of investment.

Private placements carry a substantial risk as they are subject to less regulation than are publicly offered securities, the market to resell these assets under applicable securities laws may be illiquid, due to restrictions, and the liquidation may be taken at a substantial discount to the underlying value or result in the entire loss of the value of such assets.

Venture capital funds invest in start-up companies at an early stage of development in the interest of generating a return through an eventual realization event; the risk is high as a result of the uncertainty involved at that stage of development.

Commodities are tangible assets used to manufacture and produce goods or services. Commodity prices are affected by different risk factors, such as disease, storage capacity, supply, demand, delivery constraints and weather. Because of those risk factors, even a well-diversified investment in commodities can be uncertain.

Non-U.S. securities present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

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

Andre Lamar McClure was charged with a felony in January 2000. Mr. McClure plead guilty to one simple assault misdemeanor and was sentenced to one year probation and sixty days SLAP program. The incident was resolved on May 21, 2001 and was not investment related.

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 KDM 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 KDM 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

Andre Lamar McClure is an independent licensed insurance agent, and from time to time, will offer clients advice or products from those activities. Clients should be aware that these services pay a commission or other compensation and involve a conflict of interest, as commissionable products conflict with the fiduciary duties of a registered investment adviser. KDM always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services of any representative of KDM in connection with such individual's activities outside of KDM.

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

KDM does not utilize nor select third-party investment advisers.

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

A. Code of Ethics

KDM 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. KDM's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

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

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of KDM may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of KDM 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. KDM 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 KDM may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of KDM 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, KDM will never engage in trading that operates to the client's disadvantage if representatives of KDM 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 KDM'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 KDM 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 KDM's research efforts. KDM will never charge

a premium or commission on transactions, beyond the actual cost imposed by the broker-dealer/custodian.

KDM will recommend clients to use Pershing Advisory Solutions LLC

1. Research and Other Soft-Dollar Benefits

While KDM has no formal soft dollars program in which soft dollars are used to pay for third party services, KDM may receive research, products, or other services from custodians and broker-dealers in connection with client securities transactions ("soft dollar benefits"). KDM may enter into soft-dollar arrangements consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended. There can be no assurance that any particular client will benefit from soft dollar research, whether or not the client's transactions paid for it, and KDM does not seek to allocate benefits to client accounts proportionate to any soft dollar credits generated by the accounts. KDM benefits by not having to produce or pay for the research, products or services, and KDM will have an incentive to recommend a broker-dealer based on receiving research or services. Clients should be aware that KDM's acceptance of soft dollar benefits may result in higher commissions charged to the client.

2. Brokerage for Client Referrals

KDM 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

KDM may permit clients to direct it to execute transactions through a specified broker-dealer. Clients must refer to their advisory agreements for a complete understanding of how they may be permitted to direct brokerage. If a client directs brokerage, 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 KDM 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

If KDM buys or sells the same securities on behalf of more than one client, then it may (but would be under no obligation to) aggregate or bunch such securities in a single transaction for multiple clients in order to seek more favorable prices, lower brokerage commissions, or more efficient execution. In such case, KDM would place an aggregate order with the broker on behalf of all such clients in order to ensure fairness for all clients;

provided, however, that trades would be reviewed periodically to ensure that accounts are not systematically disadvantaged by this policy. KDM would determine the appropriate number of shares and select the appropriate brokers consistent with its duty to seek best execution, except for those accounts with specific brokerage direction (if any).

Item 13: Review of Accounts

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

All client accounts for KDM's advisory services provided on an ongoing basis are reviewed at least Monthly by Andre L. McClure, Prinicpal, with regard to clients' respective investment policies and risk tolerance levels. All accounts at KDM 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 KDM's advisory services provided on an ongoing basis will receive a quarterly report detailing the client's account, including assets held, asset value, and calculation of fees. This written report will come from the custodian. KDM will also provide a written report at least quarterly.

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)

KDM does not receive any economic benefit, directly or indirectly from any third party for advice rendered to KDM clients.

B. Compensation to Non – Advisory Personnel for Client Referrals

KDM 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, KDM 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.
Clients will also receive statements from KDM and are urged to compare the account statements they received from custodian with those they received from KDM.

Item 16: Investment Discretion

KDM provides discretionary and non-discretionary investment advisory services to clients. The advisory contract established with each client sets forth the discretionary authority for trading. Where investment discretion has been granted, KDM generally manages the client's account and makes investment decisions without consultation with the client as to when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, what securities to buy or sell, or the price per share. In some instances, KDM's discretionary authority in making these determinations may be limited by conditions imposed by a client (in investment guidelines or objectives, or client instructions otherwise provided to KDM. Client will execute a limited power of attorney to evidence discretionary authority.

Item 17: Voting Client Securities (Proxy Voting)

KDM 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

KDM neither requires nor solicits prepayment of more than $500 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 KDM nor its management has any financial condition that is likely to reasonably impair KDM's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

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

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

KDM currently has only one management person: Andre Lamar McClure. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

KDM 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.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither KDM, nor its management persons, has any relationship or arrangement with issuers of securities. See Item 10.C and 11.B.