



Item 1: Cover Page

Tempo Wealth, LLC

Firm Brochure (Form ADV Part 2A)

6133 Rockside Road, Building II, Suite 400
Independence, OH, 44131
www.TempoWealth.com
(440) 568-3676

March 17, 2026

This brochure provides information about the qualifications and business practices of Tempo Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at the phone number listed above. 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. Registration (e.g. “registered investment advisor”) does not imply a certain level of skill or training.

Additional information about Tempo Wealth, LLC also is available on the SEC’s website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Pursuant to SEC rules, Tempo Wealth, LLC will ensure that clients receive a summary of any material changes to this and subsequent disclosure brochures within 120 days after the Firm's fiscal year end, December 31. This means that if there were any material changes over the past year, clients will receive a summary of those changes no later than April 30. At that time, Tempo Wealth, LLC will also offer a copy of its most current disclosure brochure and may also provide other ongoing disclosure information about material changes as necessary. If there are no material changes over the past year, no notice will be sent.

Clients and prospective clients can always receive the most current disclosure brochure for Tempo Wealth, LLC at any time by contacting their investment advisor representative.

Tempo Wealth, LLC has the following material changes to report:

- The firm has moved to a new address (listed in Item 1 above) as of October 6, 2025.
- The firm has begun to offer alternative investment products as of January 2026.

This is a new brochure as of March 17, 2026.



Item 3 Table of Contents

Item 1: Cover Page	1
Item 2: Material Changes	2
Item 3 Table of Contents	3
Item 4 Advisory Business	4
Item 5 Fees and Compensation	7
Item 6 Performance-Based Fees and Side-By-Side Management	10
Item 7 Types of Clients	10
Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	10
Item 9 Disciplinary Information	18
Item 10 Other Financial Industry Activities and Affiliations	19
Item 11 Code of Ethics, Conflicts of Interest, and Personal Trading	19
Item 12 Brokerage Practices	21
Item 13 Review of Accounts	22
Item 14 Client Referrals and Other Compensation	23
Item 15 Custody	24
Item 16 Investment Discretion	25
Item 17 Voting Client Securities	25
Item 18 Financial Information	26

Item 4 Advisory Business

Firm Description

Tempo Wealth, LLC (“Tempo Wealth” or the “Firm”) is a registered investment advisor with the U.S. Security and Exchange Commission (“SEC”). Tempo Wealth was founded on April 9, 2025.

The Principal Owners of Tempo Wealth are Timothy C. Farley Jr., Bernard T. Garrah Jr., and Corbin J. Blackburn. The Chief Compliance Officer of Tempo Wealth is Corbin J. Blackburn.

Types of Advisory Services

The Firm offers a large variety of services, including portfolio management, comprehensive financial planning, and selection of other advisors. The Firm offers these services to individuals and high net worth individuals.

Portfolio Management Services

Tempo Wealth offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. Tempo Wealth assesses clients’ current holdings and ensures alignment with both short- and long-term goals. The Firm performs ongoing reviews of investment performance and portfolio exposure to market conditions. Accordingly, the Firm is authorized to perform various functions without further approval from the client, such as the determination of securities to be purchased or sold without prior permission from the client for each transaction. Any and all trades are made in the best interest of the client as part of Tempo Wealth’s fiduciary duty. However, risk is inherent to any investing strategy and model. Therefore, Tempo Wealth does not guarantee any results or returns.

Tempo Wealth requires clients to sign a written agreement prior to the commencement of any portfolio management services. The client agreement will outline services to which the client is entitled and fees the client will incur.

Alternative Investments

Tempo Wealth, LLC may recommend or invest client assets in a variety of investment strategies, including the use of alternative investments. These may include, but are not limited to, options, private equity funds, private real estate funds, and cryptocurrency and digital assets.

Tempo typically uses alternative investments to provide diversification, reduce portfolio volatility, and seek to enhance long-term returns. The investments may be made directly or through funds, or a feeder fund, and are generally limited to clients who meet certain accreditation or qualification standards (e.g., Accredited Investor).

Before recommending or selecting an alternative investment, we conduct a due diligence process that may include:

- Reviewing offering documents, manager track records, and audited financial statements;

- Assessing manager experience and investment philosophy;
- Evaluating strategy fit within the client's overall portfolio;
- Considering liquidity, leverage, and valuation practices;
- Analyzing fee structures and potential conflicts of interest.

Due to the complexity of alternative investments, due diligence is an ongoing process, but we cannot guarantee complete transparency or full access to underlying holdings.

Digital Assets and Cryptocurrency

Tempo's investment process for selecting digital assets incorporates both quantitative and qualitative methodologies. It begins with a comprehensive market analysis, screening a broad universe of digital assets based on their market capitalization, liquidity, regulatory compliance, and underlying technology. This initial quantitative screening is complemented by a qualitative analysis, which delves into factors like its utility, its potential for scalability, its competitive positioning within the digital assets ecosystem, and its intrinsic value proposition. We also factor in macroeconomic indicators and industry trends to gauge the potential growth trajectory of the assets. Furthermore, we utilize advanced risk management tools to ensure the selected assets align with the risk-return profile of our portfolio. Each asset undergoes a rigorous due diligence process.

Digital assets are recommended to include in a client's portfolio if the following criteria are met:

- Client expresses interest or desire to purchase digital assets, and
- Client is sophisticated and understands the complex nature of this new asset class
- Client understands risk of loss and volatile nature of the asset class, and
- Upon total loss of the position, there would be no materially negative impact to the client's probability of success as defined in the client's financial plan.

These criteria are waived in the event that the client is a knowledgeable employee of Tempo, an institutional investor, or a qualified purchaser.

Comprehensive Financial Planning

Financial plans and financial planning may include but are not limited to investment planning, life insurance, tax concerns, retirement planning, real estate, college planning, and debt/credit planning. These services can range from broad-based financial planning to consultative or single subject planning. If you retain our firm for financial planning services, we will consult with you to gather information about your financial circumstances and objectives. We may also use financial planning software to determine your current financial position, and to define and quantify your long-term goals and objectives. Once we specify those long-term objectives (both financial and non-financial), we may develop shorter-term, targeted objectives.

Once we review and analyze the information you provide to our firm and the data derived from our financial planning software, we may deliver a written plan to you, designed to help you achieve your stated financial goals and objectives.

Financial plans are based on your financial situation at the time we present the plan to you, and on the

financial information you provide to us. You must promptly notify our firm of your financial situation, goals, objectives, or needs change.

Pension Consulting Services

Tempo Wealth provides investment advisory services to tax-qualified retirement plans, including defined contribution plans, under Section 3(21) of the Employee Retirement Income Security Act of 1974 (“ERISA”). When engaged in this capacity, Tempo Wealth serves as a non-discretionary investment adviser and co-fiduciary to the plan.

Tempo Wealth’s pension consulting services may include:

- Assisting plan representatives in selecting and monitoring a diversified menu of investment options made available to plan participants.
- Providing ongoing performance reporting to plan representatives regarding plan investment options.
- Advising on investment policy statements, asset classes, and fund lineups consistent with the plan’s stated objectives.
- Meeting periodically with plan representatives to review the investment lineup and overall performance.

Tempo Wealth does not provide plan administration, legal, recordkeeping, or accounting services, and will not serve as the plan’s “administrator” or “plan administrator” as those terms are defined under ERISA or the Internal Revenue Code. Plan representatives retain ultimate responsibility for the selection, monitoring, and removal of plan investment options.

Selection of Other Advisors

Tempo Wealth selects certain Independent Managers to actively manage a portion of its clients’ assets. The specific terms and conditions under which a client engages an Independent Manager may be set forth in a separate written agreement with the designated Independent Manager.

Tempo Wealth evaluates a variety of information about Independent Managers, which includes the Independent Managers’ public disclosure documents, materials supplied by the Independent Managers themselves and other third-party analyses it believes are reputable. To the extent possible, the Firm seeks to assess the Independent Managers’ investment strategies, past performance and risk results in relation to its clients’ individual portfolio allocations and risk exposure. Tempo Wealth also takes into consideration each Independent Manager’s management style, returns, reputation, financial strength, reporting, pricing and research capabilities, among other factors.

Tempo Wealth continues to provide services relative to the discretionary selection of the Independent Managers. The Firm monitors the performance of accounts with Independent Managers on an ongoing basis. Tempo Wealth seeks to ensure the strategies and target allocations implemented by Independent Managers are aligned with clients’ investment objectives and overall best interests.

Services Limited to Specific Types of Investments

Services are provided based on a client’s specific needs within the scope of the services provided as

discussed above. A review of the information provided by the client regarding the client's current financial situation, goals, and risk tolerances will be performed and advice will be provided that is in line with available information.

Wrap Fee Program versus Portfolio Management Program

Tempo Wealth does not offer a Wrap Fee Program.

Assets Under Management

As of December 31st, 2025, Tempo Wealth has the following assets under management:

Discretionary assets: \$804,265,871
 Non-discretionary assets: \$0

Item 5 Fees and Compensation

Fees and other charges

Portfolio Management:

Fees for individually managed accounts are tier priced as follows:

<i>Account Size</i>	<i>Fee (Annual percentage)*</i>
· First 1M	1.15%
· \$1M-3M	1.10%
· \$3M-6M	1.0%
· \$6M- 10M	.80%
· \$10M-\$20M	.70%
· \$20M Up	Negotiable

Wealth Management w/ Financial Planning:

· First 1M	1.0%
· \$1M-3M	1.0%
· \$3M-6M	.90%
· \$6M- 10M	.80%
· \$10M-\$20M	.60%
· \$20M Up	Negotiable

All asset-based fees are deducted by the qualified custodian of record on a quarterly basis in advance, or as otherwise indicated in the client agreement. Client statements for prior deductions will be provided on a quarterly basis. Deposits receive mid-quarter will be charged in advanced on a pro- rata basis.

All fees paid to Adviser for investment advisory services are separate and distinct from the expenses charged by third-party managers and Investment Companies to their shareholders. These fees and



expenses are described to the client in separate disclosures. These fees will generally include third-party management fees, an Investment Company management fee, other fund expenses, and in some situations a possible distribution fee.

Tempo Wealth will provide portfolio management services but will not provide custodial or other administrative services. The Client may contact the Custodian directly for disbursements, or account record changes, and may also do so in writing to the custodian.

The client is responsible for all custodial and securities execution fees charged by the custodian and executing broker dealer. Fees paid to Tempo Wealth are separate and distinct from the custodian and execution fees.

Clients may request to terminate their advisory contract with Tempo Wealth, as a whole or in part, by providing advance written notice. Upon termination, any fees paid in advance will be prorated to the date of termination and any excess will be refunded to client through the Custodian. Client's advisory agreement with Tempo Wealth is non-transferable without Client's written approval.

Fee Deduction Disclosure

Where Tempo Wealth deducts its management fee from client accounts utilizing a qualified custodian, the Adviser is required to meet the following requirements:

- a. Possess written authorization from the client to deduct advisory fees from an account held by a qualified custodian; and
- b. The firm must send the qualified custodian a written invoice detailing the amount of fee to be deducted from the client account.

Financial Planning Fees

Fixed fees are commensurate with asset-based fees and may be negotiated for investment services, and are established as fixed fees where the intent of the client is that fees are not variable automatically with changes in asset values on a quarterly basis. Fixed fee arrangements under the client agreement are for a period of one year and then convert automatically to asset-based fees unless a new fixed fee agreement is established. Fixed fees are deducted and invoiced in the same fashion as asset-based fees for investment services.

We charge financial planning fees in advance. Financial planning fees start at \$1,000 for Renewal Financial Plans for existing clients and \$3,000 minimum for new clients with a maximum of \$15,000 in planning fee. The exact fixed fees for financial planning services offered by the firm will be determined in advance based on the agreement between the client and the firm and based on the information provided by the client at that time or the complexity of the plan.

Fixed fees paid in advance will be prorated to the date of termination and the excess refunded to the client by check as soon as practicable. Where the firm may request a fee in advance, the amount paid in advance will not be more than \$1,200 per client and 6 months in advance. The remaining fixed fees will be paid after services are performed.

Pension Consulting Fees

For pension consulting services, Tempo Wealth charges an annual fee based on a percentage of plan assets under advisement, a flat fee, or a combination thereof, as set forth in the applicable 3(21) Investment Advisory Agreement. Fees are billed quarterly in arrears, as agreed upon in the agreement. Fees may be paid directly by the plan sponsor or deducted from plan assets, as directed by the plan representatives.

Pension consulting fees do not include recordkeeping fees, custodial charges, brokerage commissions, mutual fund or exchange-traded fund expenses, or other plan-related expenses, all of which are borne separately by the plan and/or participants. Tempo Wealth does not receive any commissions or other compensation from investment products recommended to plans or participants.

Selection of Other Advisor Fees

Tempo Wealth will receive a portion of the fee paid to the third-party adviser. This relationship will be memorialized in each contract between Tempo Wealth and each third-party adviser. Brinker, Lincoln, and Jefferson Nation/ Nationwide.

Fees and Expenses Related to Alternative Investments

The Client understands that Alternative Investments typically involve fees and expenses charged by the investment sponsor or manager, including management fees, performance-based fees, administrative expenses, and other fund-level costs.

Advisory fees for alternative investments may vary, but will be properly disclosed at the time of purchase. Fees for semi-liquid options and digital assets/options strategies will be based on a percentage of assets under management. For illiquid alternative investments (such as private funds or other long-term, illiquid vehicles), the Firm's advisory fees are determined on a case-by-case basis.

Any advisory fee applicable to an alternative investment will be disclosed in advance and documented in the client's advisory agreement or a written fee addendum. Total fees will not exceed 1.15%.

Right of Cancellation

In addition to the right to terminate an agreement pursuant to its terms, a client may cancel an agreement with Adviser within five (5) business days of first receiving a copy of this disclosure brochure and supplement without penalty or fee.

Client Responsibility for Third Party Fees

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange-traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or



custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, refer to the *Brokerage Practices* section of this brochure.

Fees Charged in Advance

Typically, Tempo Wealth collects fees in advance. Refunds for fees paid in advance will be returned to the client via check or return deposit back into the client's account.

For all asset-based fees paid in advance, the refunded fee 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.)

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

Compensation for Insurance Products

Certain advisory persons are also licensed as independent insurance professionals. As an independent insurance professional, an advisory person may earn commission-based compensation for selling insurance products, including insurance products they sell to clients of the firm. Insurance commissions earned by advisory persons are separate and in addition to our advisory fees. This practice presents a conflict of interest as the advisory person may have an incentive to recommend insurance products to the client for the purpose of generating commissions rather than solely based on the client's needs. Clients are under no obligation, contractually or otherwise, to purchase insurance products through any advisory person affiliated with Tempo Wealth. Please see Item 10 below.

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

Tempo Wealth does not charge or accept performance-based fees.

Item 7 Types of Clients

Tempo Wealth provides investment advice to individuals, high net worth individuals, trusts, associations and businesses.

Minimum Account Size

The Firm does not require a minimum account size. Third-party managed programs generally have account minimum requirements, and these minimum requirements vary from manager to manager. Account minimums are generally higher on fixed income accounts than equity-based accounts.

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

A. **Methods of Analysis**

The Firm may use the following methods when considering investment strategies and recommendations. These will be based on the clients' age, risk tolerance, goals and objectives.

Charting Review

Charting is a technical analysis that charts the patterns of stocks, bonds, and commodities to help determine buy and sell recommendations for clients. It is a way of gathering and processing price and volume information in a security by applying mathematical equations and plotting the resulting data onto graphs in order to predict future price movements. A graphical historical record assists the analyst in spotting the effect of key events on a security's price, its performance over a period of time, and whether it is trading near its high, near its low or in between. Chartists believe that recurring patterns of trading, commonly referred to as indicators, can help them forecast future price movements.

Fundamental Review

A fundamental analysis is a method of evaluating a company or security by attempting to measure its intrinsic value. Fundamental analysis attempts to determine the true value of a company or security by looking at all aspects of the company or security, including both tangible factors (e.g., machinery, buildings, land, etc.) and intangible factors (e.g., patents, trademarks, "brand" names, etc.). Fundamental analysis also involves examining related economic factors (e.g., overall economy and industry conditions, etc.), financial factors (e.g., company debt, interest rates, management salaries and bonuses, etc.), qualitative factors (e.g., management expertise, industry cycles, labor relations, etc.), and quantitative factors (e.g., debt-to-equity and price-to-equity ratios).

The end goal of performing fundamental analysis is to produce a value that an investor can compare with the security's current price with the aim of determining what sort of position to take with that security (e.g., if underpriced, the security should be bought; if overpriced the security should sold). Fundamental analysis uses real data to evaluate a security's value. Although most analysts use fundamental analysis to value stocks, this method of valuation can be used for many types of securities.

Technical Review

A technical analysis is a method of evaluating securities that analyzes statistics generated by market activity, such as past prices and volume. Technical analysis does not attempt to measure a security's intrinsic value but instead uses past market data and statistical tools to identify patterns that can suggest future activity. Historical performance of securities and the markets can indicate future performance.

Cyclical Review

A cyclical analysis assumes the market reacts in reoccurring patterns that can be identified and leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these reoccurring patterns, or cycles, affect the returns of a given investment, asset, or company. Cyclical

analysis is a time-based assessment which incorporates past and present performance to determine future value. Cyclical analyses exist because the broad economy has been shown to move in cycles, from periods of peak performance to periods of low performance. The risks of this strategy are two-fold: (1) the markets do not always repeat cyclical patterns; and (2) if too many investors begin to implement this strategy, it changes the very cycles of which they are trying to take advantage.

Economic Review

An economic analysis determines the economic environment over a certain time horizon. This involves following and updating historic economic data such as U.S. gross domestic product and consumer price index as well as monitoring key economic drivers such as employment, inflation, and money supply for the world's major economies.

B. Investment Strategies

When implementing investment advice to clients, the Firm may employ a variety of strategies to best pursue the objects of clients. Depending on market trends and conditions, Tempo Wealth will employ any technique or strategy herein described, at the Firm's discretion and in the best interests of the client. The Firm does not recommend any particular security or type of security. Instead, the Firm makes recommendations to meet a particular client's financial objectives. There is inherent risk to any investment and clients may suffer loss of ALL OR PART of a principal investment.

Long-Term Purchases

Long-term purchases are securities that are purchased with the expectation that the value of those securities will grow over a relatively long period, generally greater than one year. Long-term purchases may be affected by unforeseen changes in the company in which a client is invested or in the overall market. Long term trading is designed to capture market rates of both return and risk. Frequent trading can affect investment performance, particularly through increased brokerage and other transaction costs and taxes. Due to its nature, the long-term strategy can expose clients to various other 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, and political/regulatory risk.

Short-Term Purchases

Short-term purchases are securities that are purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations. Short-term trading generally holds greater risk. Frequent trading can affect investment performance due to increased brokerage fees and other transaction costs and taxes.

Strategic Asset Allocation

Asset allocation is a combination of several different types of investments; typically, this includes stocks, bonds, and cash equivalents among various asset classes to achieve diversification. The objective of asset allocation is to manage risk and market exposure while still positioning a portfolio to meet financial objectives.

Ongoing Monitoring and Oversight of Illiquid Investments

For clients who invest in private or other illiquid alternative investments, the Firm provides ongoing monitoring and advisory support. This includes assistance with subscription documentation, tracking capital calls and distributions, reviewing quarterly valuations and performance information, coordinating tax reporting materials (including Schedule K-1s), and integrating the investment into the client's financial plan, cash-flow analysis, and overall asset allocation. The Firm communicates material updates from fund managers and reviews the continued suitability of such investments in relation to the client's objectives, risk tolerance, and liquidity needs. The Firm does not provide legal or tax advice.

C. Risk of Loss

Investing inherently involves risk up to and including loss of the principal sum. Further, past performance of any security is not necessarily indicative of future results. Therefore, future performance of any specific investment or investment strategy based on past performance should not be assumed as a guarantee. Tempo Wealth does not provide any representation or guarantee that the financial goals of clients will be achieved.

The potential return or gain and potential risk or loss of an investment varies, generally speaking, with the type of product invested in. Below is an overview of the types of products available on the market and the associated risks of each:

General Risks. Investing in securities always involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives can or will be met. Past performance is in no way an indication of future performance. We also cannot assure that third parties will satisfy their obligations in a timely manner or perform as expected or marketed.

General Market Risk. Investment returns will fluctuate based upon changes in the value of the portfolio securities. Certain securities held may be worth less than the price originally paid for them, or less than they were worth at an earlier time.

Common Stocks. Investments in common stocks, both directly and indirectly through investment in shares of ETFs, may fluctuate in value in response to many factors, including, but not limited to, the activities of the individual companies, general market and economic conditions, interest rates, and specific industry changes. Such price fluctuations subject certain strategies to potential losses. During temporary or extended bear markets, the value of common stocks will decline, which could also result in losses for each strategy.

Portfolio Turnover Risk. High rates of portfolio turnover could lower the performance of an investment strategy due to increased costs and may result in the realization of capital gains. If an investment strategy realizes capital gains when it sells its portfolio investments, it will increase taxable distributions to you. High rates of portfolio turnover in a given year would likely result in short-term capital gains and under current tax law you would be taxed on short-term capital gains at ordinary income tax rates, if

held in a taxable account.

Non-Diversified Strategy Risk. Some investment strategies may be non-diversified (e.g., investing a greater percentage of portfolio assets in a particular issuer and owning fewer securities than a diversified strategy). Accordingly, each such strategy is subject to the risk that a large loss in an individual issuer will cause a greater loss than it would if the strategy held a larger number of securities or smaller positions sizes.

Model Risk. Financial and economic data series are subject to regime shifts, meaning past information may lack value under future market conditions. Models are based upon assumptions that may prove invalid or incorrect under many market environments. We may use certain model outputs to help identify market opportunities and/or to make certain asset allocation decisions. There is no guarantee that any model will work under all market conditions. For this reason, we include model-related results as part of our investment decision process but we often weigh professional judgment more heavily in making trades or asset allocations.

ETF Risks, including Net Asset Valuations and Tracking Error. An ETF's performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depository Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate.

Clients should be aware that to the extent they invest in ETF securities they will pay two levels of advisory compensation – advisory fees charged by Adviser plus any advisory fees charged by the issuer of the ETF. This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a Client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the ETF's net asset value, and therefore directly affect the ETF's performance and indirectly affect a Client's portfolio performance or an index benchmark comparison. Expenses of the ETF may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Buffer ETFs. A type of structured product investment seeks to provide investors with the upside of the underlying index; market benchmark or assets returns (generally up to a capped percentage stated in the ETFs prospectus and prospectus supplement) while also providing downside protection on the first predetermined percentage of losses. Similar to other ETFs, a buffer ETF will be designed to track a stated index, market benchmark, or asset. However, the buffer ETF will also use a portfolio of options and derivatives in order to achieve the stated capped return ("cap") and limitation of losses ("buffer").

Most buffer ETFs have a stated outcome or holding period (typically a 3 month or 12-month period), in order to realize the benefits of the hedge or limitation on losses. These limited outcome periods or

holding periods mean that only those investors who purchase at the beginning of the outcome period (e.g., on the first date of rebalancing) and hold the ETF throughout the entire outcome period will be provided with the level of return/protection stated by the prospectus. Investors who invest in these ETFs at any time after the beginning of the outcome or holding period or who liquidate their investments in these ETFs before the end of the holding or outcome period, will receive different caps and buffers on gains and losses than those stated in the ETF prospectus or prospectus supplement. Fund sponsors often post the anticipated cap on returns, buffers, and days remaining in the outcome period on the funds' websites. The updated caps, buffers, and days remaining should be considered and analyzed by an investor before investing in the buffer ETF at any time other than the beginning of the outcome period and should further be reviewed prior to liquidating any investment in such ETFs prior to the conclusion of the applicable holding or outcome period. At the end of an outcome period, the buffer ETF will roll into a new set of option contracts with the same buffer level and term length, but a new upside cap. This upside cap may be higher or lower than the preceding period and will depend on market conditions at the time. Additionally, the expenses associated with the new options contracts may impact the expenses of the ETF, which could impact returns to investors who hold these ETFs through multiple outcome periods.

Investors should understand that buffer ETFs are complex products with complicated and layered strategies. There are unique risks and considerations that investors must understand and accept before purchasing a buffer ETF. Investors should consider the following implications before purchasing a buffer ETF:

1. Exposure to the index is likely limited to price returns. Dividends and income are not included.
2. Downside protection is not eliminated and is only "buffered". Accordingly, if a given buffer ETF has a stated buffer of 10% and the underlying reference index falls 25% during the outcome period, that investor will experience a roughly 15% loss. This loss will be further increased once management fees are subtracted from the portfolio.
3. The buffer ETFs upside return is capped. Investors will not be compensated if the underlying reference index experiences a higher return than the stated cap. This cap is established to offset the costs of purchasing options to create the downside buffer, therefore the cap and buffer are inversely related. Thus, if investors require more downside protection, the trade-off is a lower upside cap (meaning a lower upside return). Conversely, if an investor requires a higher upside return it will result in less downside protection.
4. Due to the strategies employed these funds will generally exhibit a greater potential for loss than the potential for gain. In other words, by capping the upside, investors miss out on gains that exceed the upside cap, but they still participate in all downside losses beyond the stated buffer.
5. Because these buffer ETFs trade in options that are volatile in price, investors who invest in these ETFs beyond the initial holding or outcome period may experience losses due to the price fluctuations in the trading of options contracts at the start of the new holding period. It is therefore not recommended to hold these investments beyond the stated outcome or holding period.

Investors should also be aware that in addition to these risks unique to buffer ETFs, these products also face the same general risks associated with any ETF product. Please see the "ETF Risks, including Net Asset Valuations and Tracking Error" paragraph in this section above for more information regarding risks associated with ETFs.

Inflation, Currency, and Interest Rate Risks. Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by Adviser may be affected by the risk that currency devaluations affect Client purchasing power.

Liquidity Risk. Liquidity is the ability to readily convert an investment into cash to prevent a loss, realize an anticipated profit, or otherwise transfer funds out of the particular investment. Generally, investments are more liquid if the investment has an established market of purchasers and sellers, such as a stock or bond listed on a national securities exchange. Conversely, investments that do not have an established market of purchasers and sellers may be considered illiquid. Your investment in illiquid investments may be for an indefinite time, because of the lack of purchasers willing to convert your investment to cash or other assets.

Leverage Risk. Certain transactions may give rise to various forms of leverage. Such transactions may include, among others, reverse repurchase agreements, dollar rolls, borrowing, loans of portfolio securities, and the use of when-issued, delayed delivery or forward commitment transactions and short sales. The use of derivatives typically creates economic leverage and thus leverage risk. To mitigate leveraging risk, a portfolio will segregate or " earmark " liquid assets or otherwise cover the transactions that may give rise to such risk. The use of leverage may cause a portfolio to liquidate portfolio positions when it may not be advantageous to do so to satisfy its obligations or to meet segregation requirements. Leverage may cause a portfolio to be more volatile than if the portfolio had not been leveraged. This is because leverage usually exaggerates the effect of any increase or decrease in the value of a portfolio's portfolio securities. Leverage usually increases tracking error risk.

Legislative and Tax Risk. Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations, particularly for options, swaps, master limited partnerships, Real Estate Investment Trust, Exchange Traded Products/Funds/Securities. We do not engage in tax planning, and in certain circumstances a Client may incur taxable income on their investments without a cash distribution to pay the tax due. Clients and their personal tax advisors are responsible for how the transactions in their account are reported to the IRS or any other taxing authority.

Foreign Investing and Emerging Markets Risk. Foreign investing involves risks not typically associated with U.S. investments, and the risks maybe exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social, and economic developments affecting one or more foreign countries.

In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors do not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that

jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

Information Security Risk. We may be susceptible to risks to the confidentiality and security of its operations and proprietary and customer information. Information risks, including theft or corruption of electronically stored data, denial of service attacks on our website or websites of our third-party service providers, and the unauthorized release of confidential information are a few of the more common risks faced by us and other investment advisers. Data security breaches of our electronic data infrastructure could have the effect of disrupting our operations and compromising our customers' confidential and personally identifiable information. Such breaches could result in an inability of us to conduct business, potential losses, including identity theft and theft of investment funds from customers, and other adverse consequences to customers. We have taken and will continue to take steps to detect and limit the risks associated with these threats.

Tax Risks. Tax laws and regulations applicable to an account with Adviser may be subject to change and unanticipated tax liabilities may be incurred by an investor as a result of such changes. In addition, customers may experience adverse tax consequences from the early assignment of options purchased for a customer's account. Customers should consult their own tax advisers and counsel to determine the potential tax-related consequences of investing.

Advisory Risk. There is no guarantee that our judgment or investment decisions on behalf of particular any account will necessarily produce the intended results. Our judgment may prove to be incorrect, and an account might not achieve her investment objectives. In addition, it is possible that we may experience computer equipment failure, loss of internet access, viruses, or other events that may impair access to accounts' custodians' software. Adviser and its representatives are not responsible to any account for losses unless caused by Adviser breaching our fiduciary duty.

Dependence on Key Employees. An accounts success depends, in part, upon the ability of our key professionals to achieve the targeted investment goals. The loss of any of these key personnel could adversely impact the ability to achieve such investment goals and objectives of the account.

Risks Related to Alternative Investment Products

Investments in alternative products are not suitable for all clients and should only be made by those with sufficient means to understand and bear the associated risks. Before any consideration of Alternative Investments in a portfolio, perspective clients must engage in an in depth financial planning process and a 1:1 meeting with the IAR to determine if any Alternative is appropriate base on the individuals full financial profile and sophistication.

The following list of risk factors does not purport to be a complete enumeration or explanation of the risks involved with respect to Tempo's investment management activities. Clients should consult with their legal, tax, and other advisors before engaging Tempo to provide investment management services on their behalf.

Risk of Loss. Investing in alternative investments creates the potential for a loss of your entire investment.

Market Risks. Investing involves risk, including the potential loss of principal, and all investors should be guided accordingly. The profitability of a significant portion of Tempo's recommendations and/or investment decisions may depend to a great extent upon correctly assessing the future course of price movements of stocks, bonds, and other asset classes. In addition, investments may be adversely affected by financial markets and economic conditions throughout the world. There can be no assurance that Tempo will be able to predict these price movements accurately or capitalize on any such assumptions.

Volatility Risks. The prices and values of investments can be highly volatile, and are influenced by, among other things, interest rates, general economic conditions, the condition of the financial markets, the financial condition of the issuers of such assets, changing supply and demand relationships, and programs and policies of governments.

Active Portfolio Management Risk. A portfolio that employs active management strategies may, at times, outperform or underperform various benchmarks or other strategies. To meet or surpass these benchmarks, active portfolio management may require more frequent trading or "turnover." This may result in shorter holding periods, higher transactional costs and/or taxable events generally borne by the client, thereby potentially reducing, or negating certain benefits of active asset management.

Strategies involving alternative investments generally include those which do not fall into equity, fixed income or cash equivalents. Such investments would include "real assets" such as real estate and commodities, or alternative strategies such as absolute return strategies and various other hedge fund strategies: global macro, managed futures, long/short equity, multi-strategy, event driven, private equity, etc. The goal of these alternative strategies is to provide for diversification to lower portfolio volatility and enhance long-term returns. This may result in increased complexity, shorter holding periods, higher transaction costs, periods of increased volatility or taxable events generally borne by the client, thereby potentially reducing, or negating certain benefits of investing in alternative vehicles.

Alternative Investment Risks. Investing in alternative investments involves a high degree of risk. Clients should be prepared to bear risks with alternative investments that may be unique to alternative investments. Many alternative investments have long lock-up periods and limited redemptions rights; this illiquidity may restrict a client's ability to access capital. Alternative investments may lack regular pricing and are often valued using estimates or models that may not reflect actual market values. Performance may depend significantly on the skill and decision making of third-party managers, and there is no guarantee of success. Alternative investments may use leverage, which can amplify gains, but can also amplify losses. Alternative investments are generally less regulated than traditional investments, which can lead to increased exposure to fraud or mismanagement. Some funds may be concentrated in specific sectors, geographic regions, or strategies, which may increase risk. Investing in alternative investments may generate additional tax reporting (e.g., K-1s) and require additional tax planning.

Material, Significant or Unusual Securities Risks

Adviser does not primarily recommend a particular type of security.

Item 9 Disciplinary Information

Registered investment advisers are required to disclose any legal or disciplinary events that are

material to a client's or prospective client's evaluation of the advisory business or integrity of the Firm's management.

Neither Tempo Wealth nor its management has any disciplinary disclosures.

Item 10 Other Financial Industry Activities and Affiliations

Registration as a Broker/Dealer or Broker/Dealer Representative

Tempo Wealth is not registered and does not have an application pending to register, as a broker dealer and its management persons are not registered as broker/dealer representative.

Registration as a Futures Commission merchant, Commodity Pool Operator

Tempo Wealth and its management persons are not registered and do not have application pending to register, as a futures commission merchant, commodity pool operator/advisor.

Relationships Material to this Advisory Business and Possible Conflicts of Interest

Certain advisory persons of Tempo Wealth are also licensed as independent insurance agents with various insurance agencies and can sell insurance products to clients and earn commissions. Insurance commissions earned are separate and distinct from our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of Tempo Wealth who are insurance agents have an incentive to recommend insurance products to clients for the purpose of generating commissions rather than solely based on clients' needs. However, clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with the firm.

When an insurance policy is purchased by the client, the investment advisor representative is paid a commission for servicing as the agent on record. The Firm always acts in the best interest of the client, including the sale of commissionable products to advisory clients.

Selection of other Advisors

Tempo Wealth may direct clients to third-party investment advisers to manage all or a portion of the client's assets. Clients will pay Tempo Wealth its standard fee in addition to the standard fee for the advisers to which it directs those clients. This relationship will be memorialized in each contract between Tempo Wealth and each third-party advisor. The fees will not exceed any limit imposed by any regulatory agency. Tempo Wealth will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. Tempo Wealth will ensure that all recommended advisers are licensed, or notice filed in the states in which Tempo Wealth is recommending them to clients.

Item 11 Code of Ethics, Conflicts of Interest, and Personal Trading

A. Fiduciary Status

According to the SEC, an investment advisor is considered a fiduciary. As a fiduciary, it is an investment advisor's responsibility to provide fair and full disclosure of all material facts. In addition, an investment advisor has a duty of utmost good faith to act solely in the best interest of each of its clients. Tempo Wealth and its representatives have a fiduciary duty to all clients.

Tempo Wealth and its representatives' fiduciary duty to clients is considered the core underlying principle for Tempo Wealth's Code of Ethics and represents the expected basis for all representatives' dealings with clients. Tempo Wealth has the responsibility to ensure that the interests of clients are placed ahead of it or its representatives' own investment interest. All representatives will conduct business in an honest, ethical, and fair manner. All representatives will always comply with all federal and state securities laws. Full disclosure of all material facts and potential conflicts of interest will be provided to clients prior to services being conducted. All representatives have a responsibility to avoid circumstances that might negatively affect or appear to affect the representatives' duty of complete loyalty to their clients.

A copy of our Code of Ethics is available to clients and prospective clients upon request.

B. Recommendations Involving Material Financial Interests

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

C. Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you, or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

The Code of Ethics governs personal trading by each employee of Adviser deemed to be an Access Person and is intended to ensure that securities transactions affected by Access Persons of Tempo Wealth are conducted in a manner that avoids any actual or potential conflict of interest between such persons and clients of the adviser or its affiliates.

Tempo Wealth collects and maintains records of securities holdings and securities transactions affected by Access Persons. These records are reviewed to identify and resolve potential conflicts of interest.

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

See the response to Item 11C above.

Aggregated Trading

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. Client transactions always take priority to avoid front running and other manipulative practices. If a conflict is identified, it

will be investigated and actions pursuant to our written supervisory procedures will be followed.

Item 12 Brokerage Practices

A. Selection and Recommendation

Tempo Wealth has a duty to select brokers, dealers and other trading venues that provide best execution for clients. The duty of best execution requires an investment adviser to seek to execute securities transactions for clients in such a manner that the client's total cost or proceeds in each transaction is the most favorable under the circumstances, considering all relevant factors. The lowest possible commission, while very important, is not the only consideration. The brokers' dealers Tempo Wealth currently utilizes are Charles Schwab & Co. Inc., Nationwide Securities, LLC, and Altruist Financial, LLC.

It is the policy of the Firm to seek best execution in all portfolio trading activities for all investment disciplines and products, regardless of whether commissions are charged. This applies to trading in any instrument, security, or contract including equities, bonds, and forward or derivative contracts.

The standards and procedures governing best execution are set forth in several written policies. Generally, to achieve best execution, Tempo Wealth considers the following factors, without limitation, in selecting brokers and intermediaries:

- Execution capability;
- Order size and market depth;
- Availability of competing markets and liquidity;
- Trading characteristics of the security;
- Availability of accurate information comparing markets;
- Quantity and quality of research received from the broker dealer;
- Financial responsibility of the broker-dealer;
- Confidentiality;
- Reputation and integrity;
- Responsiveness;
- Recordkeeping;
- Ability and willingness to commit capital;
- Available technology; and
- Ability to address current market conditions.

Tempo Wealth evaluates the execution, performance, and risk profile of the broker-dealers it uses at least annually.

B. Research and Other Soft Dollar Benefits

Soft dollar practices are arrangements whereby an investment adviser directs transactions to a broker-dealer in exchange for certain products and services that are allowable under SEC rules. Client commissions may be used to pay for brokerage and research services and products as long as they are eligible under Section 28(e) of the Exchange Act of 1934. Section 28(e) sets forth a "safe harbor," which provides that an investment adviser that has discretion over a client account is not in breach of its fiduciary duty when paying more than the lowest commission rate available if the adviser determines in good faith that the rate paid is commensurate with the value of brokerage and research services provided by the broker-dealer.

Tempo Wealth does not currently have any soft dollar benefit arrangements.

C. Brokerage for Client Referrals

Tempo Wealth does not receive client referrals from third parties for recommending the use of specific broker-dealer brokerage services.

D. Directed Brokerage

Tempo Wealth does not allow client directed brokerage.

E. Order Aggregation

Tempo Wealth may, at times, aggregate sale and purchase orders of securities (“block trading”) for advisory accounts with similar orders in order to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively from better purchase or sale execution prices, or beneficial timing of transactions or a combination of these and other factors. Aggregate orders will be allocated to client accounts in a systematic non-preferential manner. Tempo Wealth may aggregate or “bunch” transactions for a client’s account with those of other clients in an effort to obtain the best execution under the circumstances.

Trade Error Policy

The Firm maintains a record of any trading errors that occur in connection with investment activities of its clients. Both gains and losses that result from a trading error made by the Firm will be borne or realized by the Firm.

Item 13 Review of Accounts

A. Periodic Reviews

The Firm regularly reviews and evaluates client accounts for compliance with each client’s investment objectives, policies and restrictions. The Firm analyzes rates of return and allocation of assets to determine model strategy effectiveness. Such reviews are conducted by the Chief Compliance Officer of Tempo Wealth and shall occur at least once per calendar year.

B. Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the client’s financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify Tempo Wealth promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

C. Reports

Clients may receive confirmations of purchases and sales in their accounts and will receive, at least quarterly, statements containing account information such as account value, transactions, and other relevant information. Confirmations and statements are prepared and delivered by the custodian.

D. Financial Plans

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Chief Compliance Officer. There are multiple levels of review for each financial plan. Each financial planning client will receive the financial plan upon completion.

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)

Tempo Wealth will not receive any economic benefit from another person or entity for soliciting or referring clients.

B. Other Compensation

Testimonials and Endorsements

Tempo Wealth may use testimonials and endorsements in our advertising and marketing materials. These may include statements made by current or former clients about their experience with our firm (testimonials), as well as statements made by individuals who are not clients (endorsements).

We do provide compensation—cash or non-cash—to person(s) in exchange for testimonials or endorsements. When we compensate individuals for testimonials or endorsements, we provide appropriate disclosures regarding the material terms of such compensation arrangements. All testimonials and endorsements used by the firm are voluntarily provided, and any such statements reflect the genuine opinions or experiences of the individuals involved.

We include appropriate disclosures to ensure compliance with the SEC's Marketing Rule (Rule 206(4)-1) under the Investment Advisers Act of 1940.

Third-Party Marketing Arrangements

Tempo Wealth engages third-party marketing firms that operate lead generation platforms to connect us with prospective clients. Under these arrangements, we pay fixed contractual fees over specified periods in exchange for a guaranteed minimum number of prospective client meetings. The marketing firms generate leads through their platforms and facilitate introductory meetings with prospects who may be interested in our services based on their profiles and our firm's capabilities.

Our compensation to these marketing firms is not contingent upon whether prospects become clients, nor is it based on per-client fees or revenue-sharing arrangements. The compensation we pay comes from our firm's revenues and does not result in any additional costs or fees to our clients. Clients referred through these marketing arrangements pay the same advisory fees as clients who come to us through other sources.

When you are referred to us through one of these arrangements, either we or the marketing firm will disclose the referral relationship and our compensation arrangement at or before the time of your initial meeting with us.

These marketing firms act as promoters under the SEC Marketing Rule and are subject to written agreements that include compliance and oversight provisions. We have implemented policies and procedures to ensure our marketing arrangements comply with applicable securities laws, including requirements for written promoter agreements, due diligence reviews, and ongoing monitoring of the marketing firm's activities and communications about our services.

Item 15 Custody

A. Custodian of Assets

Custody means holding, directly or indirectly, client funds or securities or having any authority to obtain possession of them.

Tempo Wealth does not maintain physical custody of any client funds and/or securities. Clients' funds and securities are held by a qualified custodian, and clients receive account statements directly from the qualified custodian at least quarterly.

Tempo Wealth is deemed to have custody of certain client funds under SEC Rule 206(4)-2 (the "Custody Rule") in the following circumstances:

- When Tempo Wealth is authorized to deduct advisory fees directly from a client's custodial account ("fee deduction"), and/or
- When Tempo Wealth is authorized to direct the custodian to transfer client funds to a third party pursuant to a standing letter of authorization ("SLOA").

Fee Deduction

Clients may authorize Tempo Wealth to directly debit advisory fees from their custodial account held at a qualified custodian. Clients provide written authorization for this arrangement.

As part of the billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. The custodian does not calculate the amount of the fee to be deducted and does not verify the accuracy of Tempo Wealth's advisory calculation. Therefore, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation. Clients should contact Tempo Wealth directly if they believe that there may be an error in their statement.

The current custodians Tempo Wealth currently utilizes are Charles Schwab & Co. Inc., Nationwide Securities, LLC, and Altruist Financial, LLC.

Standing Letters of Authorization

On February 21, 2017, the SEC issued a no-action letter (“Letter”) with respect to the Rule 206(4)-2 (“Custody Rule”) under the Investment Advisers Act of 1940 (“Advisers Act”). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of authorization (“SLOA”) is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian:

1. The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
2. The client authorizes the investment adviser, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
3. The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization and provides a transfer of funds notice to the client promptly after each transfer.
4. The client has the ability to terminate or change the instruction to the client’s qualified Custodian.
5. The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client’s instruction.
6. The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
7. The client’s qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16 Investment Discretion

Tempo Wealth may exercise full discretionary authority to supervise and direct the investments of a client’s account. This authority will be granted by clients upon completion of Tempo Wealth’s agreement. This authority allows Tempo Wealth to implement investment decisions without prior consultation with the client. Such investment decisions are made in the client’s best interest and in accordance with the client’s investment objectives. Other than agreed upon management fees due to Tempo Wealth, this discretionary authority does not grant the Firm the authority to have custody of any assets in the client’s account or to direct the delivery of any securities or the payment of any funds held in the account to Tempo Wealth. The discretionary authority granted by the client to the Firm does not allow Tempo Wealth to direct the disposition of such securities or funds to anyone except the account holder.

Item 17 Voting Client Securities

The Firm does not perform proxy voting services on the client’s behalf. Clients are encouraged to read through the information provided with the proxy voting documents and to make a determination based on the information provided. Upon the client’s request, Firm representatives may provide limited clarifications of the issues presented in the proxy voting materials based on his or her understanding of issues presented in the proxy voting materials. However, clients have the ultimate responsibility for making all proxy voting decisions.



Item 18 Financial Information

A. Balance Sheet Requirement

Tempo Wealth is not the qualified custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, six (6) months or more in advance.

B. Financial Condition

Tempo Wealth does not have any financial impairment that would preclude the Firm from meeting contractual commitments to clients.

C. Bankruptcy Petition

Tempo Wealth has not been the subject of a bankruptcy petition at any time during the last 10 years.