

**ITEM 1: COVER PAGE FOR PART 2B OF FORM ADV:
BROCHURE SUPPLEMENT
MARCH 2018**

KEVIN LEE BIDENKAP

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This brochure supplement provides information about Kevin Bidenkap that supplements our Form ADV Part 2A brochure. You should have received a copy of that brochure. Please contact Angela Park Sheldon, Chief Compliance Officer, if you did not receive our firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Kevin Bidenkap is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 2492838.

ITEM 2. EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Kevin Bidenkap

Year of Birth: 1968

Business Experience

- 2010 – Present, Tortuga Wealth Management, Inc., President
- 2010 – Present, LPL Financial, Registered Representative
- 2009 – 2010, Morgan Stanley Smith Barney, Second Vice President
- 2005 – 2009, Citi Smith Barney, Second Vice President
- 1999 – 2005, Morgan Stanley D.W., Inc., Associate Vice President

Education, Professional Designations, Licensing and Exams

- 1990 – Arizona State University, Bachelor of Science
- 2004 – Chartered Life Underwriter (CLU®)
- 2003 – Chartered Financial Consultant (ChFC®)
- 2003 – Certified Financial Planner (CFP®)
- 1996 – CA Insurance LF, AV, VA, VL
- 1995 – Series 7, Series 31, Series 63
- 1994 – Series 6

Certified Financial Planner (CFP®) – Candidates must pass a CFP-board registered program or hold one of seven advanced degrees, designations or professional licenses and pass the CFP exam. Current prerequisites include a bachelor's degree (or higher) from an accredited college or university and three years of full-time personal financial planning experience. Thirty hours of continuing education must be completed every two years. Areas of study include insurance and estate planning, employee benefit and tax planning, as well as investment and retirement planning. CFP practitioners are also subject to strict adherence to the CFP Board's Financial Planning Practice Standards and Professional Code of Ethics and Responsibility.

Chartered Financial Consultant (ChFC®) - Chartered Financial Consultant designations are granted by The American College upon completion of seven required courses and two elective courses. In order to be considered for the program, the applicant must already have a minimum of three years working in the financial industry. The program prepares advisors to meet the advanced financial planning needs of individuals, professionals and small business owners. Advisors gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning.

Chartered Life Underwriter (CLU®) - A professional designation for individuals who wish to specialize in life insurance and estate planning. Individuals must complete five core courses and three elective courses, and successfully pass all eight two-hour, 100-question examinations in order to receive the designation. Each CLU® must also complete a minimum of 30 hours of continuing education every two years and meet extensive experience requirements, ensuring the knowledge you're counting on is both comprehensive and current.

ITEM 3. DISCIPLINARY INFORMATION

If there are legal or disciplinary events material to your evaluation of Mr. Bidenkap, we are required to disclose all material facts regarding those events.

We have nothing to disclose in this regard.

ITEM 4. OTHER BUSINESS ACTIVITIES

A. If Mr. Bidenkap is actively engaged in any investment-related business or occupation, including if Mr. Bidenkap is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

1. If a relationship between the advisory business and Mr. Bidenkap's other financial industry activities creates a material conflict of interest with you, the SEC requires us to describe the nature of the conflict and generally how we address it.

Mr. Bidenkap is a licensed insurance agent through various insurance companies. In such a capacity, he may offer insurance products and receive normal and customary commissions as a result of such a purchase. This presents a conflict of interest to the extent that he may recommend the purchase of an insurance product which results in a commission being paid to him as an insurance agent. Mr. Bidenkap spends approximately 20% of his time on this outside activity. Clients are under no obligation to act upon any recommendations of Mr. Bidenkap or effect any transactions through Mr. Bidenkap if they decide to follow the recommendations.

2. If Mr. Bidenkap receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service ("trail") fees from the sale of mutual funds, we have to disclose this fact. If this compensation is not cash, we are required to explain what type of compensation Mr. Bidenkap receives. We must explain that this practice gives Mr. Bidenkap an incentive to recommend investment products based on the compensation received, rather than on your needs.

Kevin Bidenkap is a Registered Representative with LPL Financial. In such a capacity, he may offer securities and receive normal and customary commissions as a result of securities transactions. This presents a conflict of interest to the extent that he recommends that a client invest in a security which results in a commission being paid to him. Mr. Bidenkap spends approximately 50% of his time on this activity. Clients are under no obligation to act upon any recommendations of Mr. Bidenkap or effect any transactions through Mr. Bidenkap if they decide to follow the recommendations.

B. If Mr. Bidenkap is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of Mr. Bidenkap's income or involve a substantial amount of Mr. Bidenkap's time, we are required to disclose this fact and must describe the nature of that business. If the

other business activities represent less than 10 percent of Mr. Bidenkap's time and income, we may presume that they are not substantial.

Kevin Bidenkap does not participate in any additional outside business that is considered substantial to disclose.

ITEM 5. ADDITIONAL COMPENSATION

If someone who is not a client provides an economic benefit to Mr. Bidenkap for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include Mr. Bidenkap's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

ITEM 6. SUPERVISION

We are required to explain how we supervise Mr. Bidenkap, including how we monitor the advice Mr. Bidenkap provides to you. Our firm has to provide the name, title and telephone number of the person responsible for supervising Mr. Bidenkap's advisory activities on behalf of our firm.

Angela Park Sheldon, Vice President and Chief Compliance Officer, supervises and monitors Mr. Bidenkap's activities on a regular basis to ensure compliance with our firm's code of ethics. Please contact Ms. Sheldon if you have any questions about Mr. Bidenkap's brochure supplement at 310-906-0517.

ITEM 7. REQUIREMENTS FOR STATE-REGISTERED ADVISERS

In addition to Item 3 of this ADV Part 2B Brochure, Mr. Bidenkap has not been involved in any arbitration claim, civil, self-regulatory organization, or administrative proceeding, or filed bankruptcy. Mr. Bidenkap does not have any material disciplinary events to disclose.