

**Nicholas Harroz III**

**Mark I Asset Management, Ltd.**

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**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Nicholas Harroz III that supplements the Mark I Asset Management, Ltd. brochure. You should have received a copy of that brochure. Please contact Jerry W. Plant, Chief Compliance Officer, if you did not receive Mark I Asset Management Ltd's brochure or if you have any questions about the contents of this supplement.

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

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## ***Educational Background and Business Experience***

Form ADV Part 2B, Item 2

Disclose the supervised person's name, age (or year of birth), formal education after high school, and business background (including an identification of the specific positions held) for the preceding five years. If the supervised person has no high school education, no formal education after high school, or no business background, disclose this fact. You may list any professional designations held by the supervised person, but if you do so, you must provide a sufficient explanation of the minimum qualifications required for each designation to allow clients to understand the value of the designation.

### **Name**

*Year of Birth:* 1980

### *Formal Education after High School:*

- Baylor University, Bachelor of Business Administration, Accounting, 2003
- Baylor University, Master of Accountancy, 2004
- Oklahoma City University, Juris Doctor, 2009
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### *Business Background for the Previous Five Years:*

- Mark I Asset Management, Ltd., President, August 2008 - Present
- University of Central Oklahoma, Adjunct Accounting Professor, January 2007 -- August 2008
- Self Employed, Consultant, April 2006 -- December 2006
- KPMG LLP, Accountant, August 2004 -- April 2006

### *Certifications:*

- Certified Public Accountant (OK 2005)
- Oklahoma Bar Association (OK 2009)

### *Biography:*

Nick Harroz III is president of Mark I Asset Management, an Oklahoma-based investment advisory firm that provides personalized investment and wealth management services.

Harroz, a Certified Public Accountant (CPA) and registered investment advisor, joined Mark I in 2008. Prior to Mark I, Harroz served as an adjunct professor of accounting at the University of Central Oklahoma and as a tax consultant in private practice.

From 2004 until 2006, Harroz was an accountant in the audit division of KPMG, a major international accounting firm, where he represented clients in the financial services and non-profit sector.

Active in the community, Harroz currently serves as the Epworth Villa finance/audit committee chair and as a board member. He is a member of the board of directors for St. Luke's United Methodist Church Foundation.

Harroz is frequently used as an expert source on financial matters and has been featured in The Oklahoman, OKC Biz, The Journal Record, Tulsa Business Journal, KFOR, KWTW and in NewsOk videos. He also contributes weekly to a Journal Record blog called Wall Street Matters.

Harroz received a Bachelor of Business Administration in Accounting in 2003 and a Master of Accountancy in 2004, both from Baylor University. While in graduate school, he was a portfolio manager of the Phil Dorr Investment Fund, a student-run fund that manages a portion of Baylor University's endowment. He received his Juris Doctor degree from Oklahoma City University.

## Disciplinary Information

Form ADV Part 2B, Item 3

If there are legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person, disclose all material facts regarding those events.

Items 3.A, 3.B, 3.C, and 3.D below list specific legal and disciplinary events presumed to be material for this Item. If the supervised person has been involved in one of these events, you must disclose it under this Item for ten years following the date of the event, unless (1) the event was resolved in the supervised person's favor, or was reversed, suspended or vacated, or (2) you have rebutted the presumption of materiality to determine that the event is not material (see Note below). For purposes of calculating this ten-year period, the "date" of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments or decrees lapsed.

Items 3.A, 3.B, 3.C, and 3.D do not contain an exclusive list of material disciplinary events. If the supervised person has been involved in a legal or disciplinary event that is not listed in Items 3.A, 3.B, 3.C, or 3.D but is material to a client's or prospective client's evaluation of the supervised person's integrity, you must disclose the event. Similarly, even if more than ten years have passed since the date of the event, you must disclose the event if it is so serious that it remains currently material to a client's or prospective client's evaluation. If you deliver a supplement electronically and if a particular disclosure required below for the supervised person is provided through either the Financial Industry Regulatory Authority's (FINRA) BrokerCheck system or the IAPD, you may satisfy that particular disclosure obligation by including in that supplement (i) a statement that the supervised person has a disciplinary history, the details of which can be found on FINRA's BrokerCheck system or the IAPD, and (ii) a hyperlink to the relevant system with a brief explanation of how the client can access the disciplinary history. The BrokerCheck link is [www.finra.org/brokercheck](http://www.finra.org/brokercheck); the IAPD link is [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

- A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which the supervised person
1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
  2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
  3. was found to have been involved in a violation of an investment-related statute or regulation; or
  4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

This is not applicable to this supervised person.

- B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person
1. was found to have caused an investment-related business to lose its authorization to do business; or
  2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority

- (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business;
- (b) barring or suspending the supervised person's association with an investment-related business;
- (c) otherwise significantly limiting the supervised person's investment-related activities; or
- (d) imposing a civil money penalty of more than \$2,500 on the supervised person.

This is not applicable to this supervised person.

C. A self-regulatory organization (SRO) proceeding in which the supervised person

- 1. was found to have caused an investment-related business to lose its authorization to do business; or
- 2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members, or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

This is not applicable to this supervised person.

D. Any other proceeding in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct. If the supervised person resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a proceeding (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

This is not applicable to this supervised person.

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### ***Other Business Activities***

Form ADV Part 2B, Item 4

A. If the supervised person is actively engaged in any investment-related business or occupation, including if the supervised person 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, disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

- If a relationship between the advisory business and the supervised person's other financial industry activities creates a material conflict of interest with clients, describe the nature of the conflict and generally how you address it.
- If the supervised person 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, disclose this fact. If this compensation is not cash, explain what type of compensation the supervised person receives. Explain that this practice gives the supervised person an incentive to recommend investment products based on the compensation received, rather than on the client's needs.

This is not applicable to this supervised person.

B. If the supervised person 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 the supervised person's income or involve a substantial amount of the supervised person's time, disclose this fact and describe the nature of that business. If the other business activities represent less than 10 percent of the supervised person's time and income, you may presume that they are not substantial.

This is not applicable to this supervised person.

### ***Additional Compensation***

Form ADV Part 2B, Item 5

If someone who is not a client provides an economic benefit to the supervised person for providing advisory services, generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include the supervised person'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.

This is not applicable to this supervised person.



## ***Supervision***

Form ADV Part 2B, Item 6

Explain how you supervise the supervised person, including how you monitor the advice the supervised person provides to clients. Provide the name, title and telephone number of the person responsible for supervising the supervised person's advisory activities on behalf of your firm.

Supervised persons monitor daily transactions in client accounts via the portfolio management software. This ensures that all transactions are in accordance with the detailed investment plan Mark I formulates with its clients.

At least once a week, Mark I's supervised persons confer about client accounts and current investment policy. All of Mark I's supervised persons office within close proximity to each other. They frequently communicate in person and via telephone and email.

Supervised persons of Mark I:

Jerry W. Plant, CEO/Chief Compliance Officer, 405-525-6688 ext 1

Nicholas Harroz III, President, 405-525-6688 ext 2

