

Item 1 – Cover Page

Navigator Money Management, Inc.
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This brochure provides information about the qualifications and business practices of Navigator Money Management, Inc., (NMM). If you have any questions about the contents of this brochure please contact us at (866) 688-0028 or info@navigatormoney.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.

Navigator Money Management, Inc. (NMM) is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training. The oral and written communications of an adviser provide you with information about which you determine to hire or retain an adviser.

Additional information about Navigator Money Management, Inc., (NMM) is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

On July 28, 2010, the United States Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC rules. This brochure dated March 22, 2011, is a new document prepared according to the SEC’s new requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are to be made to the brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past, we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new brochure as necessary based on changes or new information, at any time, without charge.

Currently, our brochure may be requested by contacting Laurie Baltich, Relationship Manager, at 1-866-688-0028 or info@navigatormoney.com. Our brochure is also available on our website at www.navigatormoney.com free of charge.

Additional information about Navigator Money Management (NMM), is available via the SEC’s website www.adviserinfo.sec.gov. The SEC’s website also provides information about any persons affiliated with NMM who are registered, or are required to be registered, as investment adviser representatives of NMM.

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	5
Item 6 – Performance Based Fees and Side-by-Side Management	7
Item 7 – Type of Clients	7
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	8
Item 9 – Disciplinary Information	9
Item 10 – Other Financial Industry Activities and Affiliations	9
Item 11 – Code of Ethics	10
Item 12 – Brokerage Practices	11
Item 12A - - Trade Order Allocation/Aggregation Policies	14
Item 13 – Review of Accounts	15
Item 14 – Client Referrals and Other Compensation	15
Item 15 - Custody	15
Item 16 – Investment Discretion	16
Item 17 – Voting Client Securities	16
Item 18 – Financial Information	16
Brochure Supplement(s)	

Item 4 – Advisory Business

Navigator Money Management, Inc. (NMM), is a SEC registered Investment Adviser, initially registered in March 1996. Navigator Money Management, Inc. (NMM) offers a combination of advisory services, broadly described as Portfolio Management Services and Financial Planning Services, as more fully described below.

Mark A. Grimaldi and Joseph V. Visconti are the principals of Navigator Money Management, Inc. Mark A. Grimaldi is the majority owner of NMM, a New York State Corporation formed in March 1996.

NMM offers a combination of advisory services including the following:

(a) Portfolio Management Services

NMM provides continuous advice to you regarding the investment of your funds based on your individual needs.

Through personal discussions with you, we establish your goals and objectives based on your unique circumstances. We help you develop your personal investment strategy and manage your portfolio on the basis of the agreed upon strategy.

When we select the investments for your portfolio, we are guided by your specifications, which may include capital appreciation, growth and income, income, or sector rotation.

You may impose reasonable restrictions on investing in certain securities or types of securities. NMM requires that such restrictions be included in a written authority statement (generally as part of your Investment Management Contract with us and as amended from time-to-time in writing). You may change/amend these restrictions as desired with such amendments submitted in writing.

(b) Financial Planning Services

NMM also provides Financial Planning advice. NMM gathers required information through in-depth personal interviews. BMM may ask you about your current financial status, future goals and attitudes towards risk. NMM carefully reviews any appropriate documentation that you provide.

In general, financial planning discussions may address any or all of the following areas that may be of concern to you:

Personal: Family records, budgeting, personal liability, estate information, and financial goals.

Education: Education IRA's, financial aid, state savings plans, grants and general assistance in preparing to meet our dependents continuing educational needs through development of an education plan.

Tax and Cash Flow: Income tax planning and spending analysis. For example, we may illustrate the impact of various investments on your current income tax and future tax liability.

Death and Disability: Cash needs at death, income needs of surviving dependents, estate planning and disability income analysis.

Retirement: Analysis of current strategies and investment plans to help you achieve your retirement goals.

Investments: Analysis of investment alternatives and their effect on your portfolio.

If you choose to implement the recommendations discussed in the financial planning consultation, NMM suggests that you work closely with your attorney, accountant, insurance agent and/or stockbroker. Implementation of financial planning recommendations is entirely at your discretion.

NMM's financial planning recommendations are not limited to any specific product or service offered by a broker dealer or insurance company. All recommendations are of a generic nature.

NMM does not charge you any fees for financial planning consultations. **"Item 5 – Fees and Compensation"** provides additional information regarding how and when management fees are assessed.

(c) Total Client Assets under Management

As of February 28, 2011, the calculated amount of client assets managed by NMM was \$117,000,000 on a discretionary basis and NMM does not manage assets on a non-discretionary basis.

Item 5 – Fees and Compensation

The specific manner in which fees are charged by NMM is established in a client's written agreement with NMM. NMM will generally bill its fees on a quarterly basis in advance of each calendar quarter. Management fees are prorated for each capital contribution made during the applicable calendar quarter. Accounts initiated during a calendar quarter will be charged a prorated fee, and for accounts that are terminated, the fee will be pro-rated to the date of termination.

The annual fee for managing your portfolio is charged as a percentage of assets under management. The adviser has several investment advisory agreements based on services provided. The annual management fee is typically between 1% and 1.8% annually.

NMM will quote an exact percentage to you based on the nature and total dollar value of your account.

In certain circumstances, all fees and account minimums may be negotiable. For example, certain related accounts may be aggregated for the purpose of achieving the minimum account size or lower annual fee.

Certain existing clients may be paying fees that are lower than those indicated on the above schedule. Also, certain family members and personal acquaintances of NMM's affiliated persons may receive advisory services at a discounted rate that is not generally available to the general public.

Fees are charged quarterly in advance based on the asset size of your account on the last day of the prior calendar quarter. Services rendered prior to that date, but not yet billed, are charged according to the above schedule based on our account balance for that period.

Fees are directly debited from your custodial account with your written consent generally acknowledged in your Asset Management Agreement.

Your agreement may be canceled by either you or NMM, at any time, for any reason. You have the right to terminate your agreement without penalty anytime after entering into it.

NMM's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which will be incurred by you. You may incur certain charges imposed by custodians, brokers, third party investment and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange-traded funds also charge internal management fees, or mutual fund distribution fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to NMM's fee. NMM and its supervised persons do not receive any portion of these commissions, fees, and costs, and do not receive compensation from the sale of any securities or investment products.

NMM is the investment adviser for the Sector Rotation Fund (NAVFX), formerly known as the Navigator Fund. The Adviser will receive compensation for such management duties. This compensation is in addition to the investment advisory fee and does not increase the cost or reduce the return to any shareholder of NAVFX. NAVFX is a no-load fund.

You could invest in a mutual fund directly, without the services of NMM. In that case, you would not receive the services provided by NMM which are designed, among other things,

to assist you in determining which mutual fund or funds are most appropriate for your individual financial situation and investment strategy.

NMM has set its rates to take into consideration these additional charges – if any. However, NMM recommends that you review the fees charged by the funds, custodians and broker dealers and the fees charged by NMM to fully understand the total amount of fees to be paid by you and to evaluate the advisory services being provided.

Please refer to “Item 12 – Brokerage Practices” which further describes the factors that NMM considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation. (e.g., commissions)

Item 6 – Performance-Based Fees and Side-by-Side Management

In this item, registered investment advisers are required to disclose all material facts regarding performance based fees and the simultaneous management of accounts that may have alternative fee arrangements.

Furthermore, NMM has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to help prevent conflicts from influencing the allocation of investment opportunities among clients.

The adviser offers a Portfolio Performance Program. The minimum account size is \$1,000,000 and requires pre-approval of the Chief Compliance Officer. The compensation shall not exceed 20% of the account’s performance above the pre-selected market-index benchmark.

Item 7 – Types of Clients

NMM offers its advisory services to individuals, high net worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations and corporations or other business entities.

Participation in portfolio management services and/or financial planning consultations requires a minimum portfolio size of \$250,000. Occasionally, the minimum portfolio size of \$250,000 is waived. NMM may also waive the minimum size for charitable organizations. Additionally, certain related accounts may be aggregated for the purpose of achieving the minimum account size. “**Item 5 – Fees & Compensation**” further describes factors that NMM considers when determining minimum account size.

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

On a daily basis, NMM reviews the global economic landscape to ascertain when and if indicators support the purchase or sale of specific types of investments for client portfolios. Some of the indicators that we may use in our decision-making process includes: investor sentiment, money supply, consumer confidence, industrial production, consumption and distribution, inventories and orders, inflation, employment, construction, yield curve/interest rates, monetary policy, and political factors, among others.

Once NMM has determined that the global economic landscape supports the purchase of investments for client portfolios, it begins selecting specific assets. In doing so, NMM invests primarily in no-load or load-waived open-end mutual funds or exchange traded funds (ETFs). Your portfolio may include individual equities, preferred equities, individual corporate and municipal bonds, CD's and other investment products, if appropriate. You will retain ownership of all securities.

NMM allocates assets among various investments taking into account the overall investment strategy selected by you. The selection of specific assets for your portfolio may be based on any or all of the following:

Mutual Funds Equity, Fixed Income, or Balanced	Exchange Traded Funds	Individual Corporate & Municipal Bonds
<ul style="list-style-type: none">- Performance history- Industry sectors that the fund invests in- Track record of the manager- Stated investment objectives- Management style and philosophy- Fee structure	<ul style="list-style-type: none">- Liquidity- Industry sector and asset classes that the ETF invests in- Fee structure and costs	<ul style="list-style-type: none">- Bond rating- Yield to maturity- Coupon rate- Material schedule- Whether or not the bond is callable

Portfolio weightings between assets and market sectors will be determined by your individual needs and investment strategy.

Equity investing is subject to price fluctuation and market risk. Growth oriented investments may be more sensitive to market movements because their prices tend to reflect future investor expectations rather than just current profits. Small and mid-cap stocks involve greater risks and volatility than large-cap stocks.

Fixed income investing involves credit risk, interest rate risk (when interest rates rise, bond/fund prices generally fall), and inflation or reinvestment risks. Below-investment-

grade (“junk”) bonds are more at risk of default than other bond investments and are subject to liquidity risk.

Investments in foreign securities entail special risks (such as currency fluctuations and political factors) and may have higher expenses and volatility. Investments in emerging and developing markets may be especially volatile.

Large sector holdings may expose you to greater volatility and special risks associated with that sector. It is not the practice of NMM to employ investment strategies that require frequent trading.

If you choose to follow high-risk strategies, you may incur significant losses, as much as all of the assets you have invested in this manner. NMM strongly recommends that you diversify your investments and not commit all of your assets to high-risk investment strategies.

Investing in securities involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Navigator Money Management, Inc., or the integrity of NMM’s management.

NMM has no information applicable to this item. ***No disciplinary history exists for NMM and/or its associated persons.***

Item 10 – Other Financial Industry Activities and Affiliations

Registered investment advisers are required to disclose all material facts regarding other financial industry activities and affiliations that would be material to your evaluation of Navigator Money Management and NMM’s management.

NMM does not use any other advisers or sub-advisers. The adviser provides asset management services to Geneos Wealth Management on a third-party basis.

Item 11 – Code of Ethics

NMM has adopted a Code of Ethics for all supervised persons describing its high standard of business conduct, fiduciary duty to its clients and compliance with applicable securities laws.

NMM's Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at NMM must acknowledge the terms of the Code of Ethics annually, or as amended.

NMM's employees and persons associated with NMM are required to follow NMM's Code of Ethics.

It is NMM's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. NMM will also not cross trades between client accounts.

Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account.

An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross-transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. NMM is not dually registered as a broker-dealer nor do we maintain any affiliated broker-dealer relationships.

Subject to satisfying this policy and applicable laws, officers, directors and employees of NMM and its affiliates may trade for their own accounts in securities which are recommended to an/or purchased for NMM's clients.

The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of NMM will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to investment for their own accounts.

Under the Code, certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the vest interest of NMM's clients. In addition, the code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity.

NMM's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Mark A. Grimaldi.

Item 12 – Brokerage Practices

The Custodian and Brokers We Use

NMM does not maintain custody of your assets that we manage; although we may be deemed to have custody of your assets if you give us authority to withdraw assets from your account. (See “**Item 15 – Custody**”, below) Most of our managed assets will be maintained in an account at a “qualified custodian,” generally a broker dealer or bank. NMM uses Charles Schwab & Company, Inc., (Schwab), a registered broker-dealer, member SIPC, Fidelity Investments, and TD Ameritrade as the qualified custodians. NMM is independently owned and operated and is not affiliated with Schwab, Fidelity, or TD Ameritrade. Schwab/Fidelity/TD Ameritrade will hold your assets in a brokerage account and buy and sell securities when we instruct them to do so. While we request that you use Schwab/Fidelity/TD Ameritrade as custodian/broker, you will decide whether to do so and will open your account with Schwab/Fidelity/TD Ameritrade by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so.

You should note that, while NMM has a reasonable belief that Schwab/Fidelity/TD Ameritrade is able to obtain best execution and competitive prices, NMM will not be independently seeking their best execution price capability through other broker dealers and this may cost you more money. Not all advisers require their clients to use a particular broker-dealer or other custodian selected by the adviser. Even though your account is maintained at Schwab, Fidelity, or TD Ameritrade, we can still use other brokers to execute trades for your account as described below. (See “**Your Brokerage and Custody Costs**”.)

How We Select Brokers/Custodians

NMM seeks to use a custodian/broker who will hold your assets and execute transactions on terms that are overall advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- Combination of transaction execution services along with asset custody services (generally without a separate fee for custody)
- Capability to execute, clear and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, etc.)

- Breadth of investment products made available (stocks, bonds, mutual funds exchange traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate them.
- Reputation, financial strength and stability of the provider
- Their prior service to us and our other clients
- Availability of other products and services that benefit us, as discussed below (see **“Products and Services Available to us from Schwab, Fidelity and TD Ameritrade”**)

Your Brokerage and Custody Costs

For our clients’ accounts that Schwab/Fidelity/TD Ameritrade maintains, Schwab/Fidelity/TD Ameritrade generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Schwab/Fidelity/TD Ameritrade account. In addition to commissions, Schwab/Fidelity/TD Ameritrade charges you a flat dollar as a “prime broker” or “trade away” fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab/Fidelity/TD Ameritrade account. These fees are in addition to the commissions or other compensation you pay the executing broker-dealer. Because of this, in order to minimize your trading costs, we have Schwab/Fidelity/TD Ameritrade execute most trades for your account.

We have determined that having Schwab/Fidelity/TD Ameritrade execute most trades is consistent with our duty to seek “best execution” of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above. (See **“How We Select Brokers/Custodians”**)

Products and Services Available to Us from Schwab/Fidelity/TD Ameritrade

Schwab Advisor Services (formerly called Schwab Institutional©) is Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to its institutional brokerage trading, custody, reporting, and related services—many of which are not typically available to Schwab retail customers. Schwab/Fidelity/TD Ameritrade also makes available various support services. Some of those services help us manage or administer our clients’ accounts; while other help us manage and grow our business. Schwab/Fidelity/TD Ameritrade’s support services generally are available on an unsolicited basis (we don’t have to request them) and at no charge to us as long as our clients collectively maintain a total of at least \$10 million of their assets in accounts at Schwab/Fidelity/TD Ameritrade. Following is a more detailed description of Schwab/Fidelity/TD Ameritrade’s support services:

Services that Benefit You: Schwab/Fidelity/TD Ameritrade's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab/Fidelity/TD Ameritrade include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab/Fidelity/TD Ameritrade's services described in this paragraph generally benefit you and your account.

Services that May Not Directly Benefit You: Schwab/Fidelity/TD Ameritrade also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab/Fidelity/TD Ameritrade's own and that of third parties. We may use this research to service all of a substantial number of our clients' accounts, including accounts not maintained at Schwab/Fidelity/TD Ameritrade. In addition to investment research, Schwab/Fidelity/TD Ameritrade also makes available software and other technology that:

- Provide access to client account data (such as duplicate trade confirmations and account statements)
- Facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- Provide pricing and other market data
- Facilitate payment of our fees from our clients' accounts
- Assist with back-office functions, recordkeeping, and client reporting

Services that Generally Benefit Only Us: Schwab/Fidelity/TD Ameritrade also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers

Schwab/Fidelity/TD Ameritrade may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab/Fidelity/TD Ameritrade may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab/Fidelity/TD Ameritrade may also provide us with other benefits, such as occasional business entertainment of our personnel.

On an ongoing basis, NMM uses the technology applications provided by Schwab/Fidelity/TD Ameritrade to access client account information, facilitate payment of our fees, and execute and allocate trade orders for multiple client accounts.

We have routinely attended educational conferences and events offered by Schwab/Fidelity/TD Ameritrade on practice management, compliance, technology, research, and other business related activities. We have also consulted with Schwab/Fidelity/TD Ameritrade and/or third parties recommended by Schwab/Fidelity/TD Ameritrade regarding technology, compliance and other business needs.

Our Interest in Schwab/Fidelity/TD Ameritrade's Services

The availability of these services from Schwab/Fidelity/TD Ameritrade benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab/Fidelity/TD Ameritrade's services so long as our clients collectively keep a total of at least \$10 million of their assets in accounts at Schwab/Fidelity/TD Ameritrade. Beyond that, these services are not contingent upon us committing any specific amount of business to Schwab/Fidelity/TD Ameritrade in trading commissions or assets in custody. The \$10 million minimum may give us an incentive to require that you maintain your account with Schwab/Fidelity/TD Ameritrade, based on our interest in receiving Schwab/Fidelity/TD Ameritrade's services that benefit our business rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab/Fidelity/TD Ameritrade as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab/Fidelity/TD Ameritrade's services (see **"How We Select Brokers/Custodians"**) and not Schwab/Fidelity/TD Ameritrade's services that benefit only us.

Item 12A – Trade Order Allocation/Aggregation Policies

NMM's policy is to aggregate client transactions where possible and when advantageous to clients (generally referred to as a "block trade.") In these instances, clients participating in aggregated transactions will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. As a matter of policy, an adviser's allocation procedures must be fair and equitable to all clients with no particular group or client(s) being favored or disfavored over any other clients. NMM's policy prohibits any allocation of trades in a manner that NMM's affiliated accounts, or any particular client(s) or group of clients receive more favorable treatment than other client accounts. Generally, NMM allocates partially-filled trade orders on a pro rata basis; however other allocation practices may include exception allocations, random allocations, and rotational allocations, depending on the asset involved.

Item 13 – Review of Accounts

Portfolio Management Services: While the underlying securities within portfolio management services accounts are continuously monitored, these accounts are reviewed at least quarterly by Mark A. Grimaldi. Accounts are reviewed in the context of each client's stated investment strategy and guidelines. More frequent reviews by Mark Grimaldi may be triggered by material changes in variables such as the client's individual circumstances, the market or the political or economic environment.

Financial Planning Services: While reviews may occur at different stages depending on the nature and terms of the specific engagement of NMM, typically no formal reviews will be conducted for financial planning clients, except as may be agreed upon at the inception of the financial planning discussion.

Reports: Schwab/Fidelity/TD Ameritrade provide monthly statements and confirmations of transactions. In addition, we urge you to compare and review the calculation and fee paid to NMM against valuations included in the custodial statements. **Item 15 – Custody**, further describes additional types and frequency of reports available.

Item 14 – Client Referrals and Other Compensation

We receive an economic benefit from Schwab/Fidelity/TD Ameritrade in the form of the support products and services it makes available to us and other independent investment advisors whose clients maintain their accounts at Schwab/Fidelity/TD Ameritrade. These products and services, how they benefit us, and the related conflicts of interest are described above (see “**Item 12 – Brokerage Practices**”). The availability to us of Schwab/Fidelity/TD Ameritrade's products and services is not based on us giving particular investment advice, such as buying particular securities for our clients. NMM does not receive compensation or any economic benefit from any individuals or entities not a client of NM that provide investment advice or other advisory services to NMM's clients.

Furthermore, as a matter of policy and practice, NMM does not compensate or provide any economic benefit to any individuals or entities, for the referral of advisory clients to NMM.

Item 15 – Custody

Under government regulations, we are deemed to have custody of your assets, if, for example, you authorize us to instruct Schwab/Fidelity/TD Ameritrade to deduct our advisory fees directly from your account. Schwab/Fidelity/TD Ameritrade maintains actual custody of your assets. You will receive account statements directly from Schwab/Fidelity/TD Ameritrade at least quarterly. They will be sent to the email or postal mailing address you provided to Schwab/Fidelity/TD Ameritrade. You should carefully review those statements promptly when you receive them.

Item 16 – Investment Discretion

NMM usually receives written discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment strategy, limitations and restrictions of the clients for which it advises.

Prior to exercising discretionary authority for client accounts, clients are required to execute a written limited power of attorney authorizing the broker/dealer/custodian to execute trades initiated by NMM.

You may impose written reasonable limitations on NMM's discretionary authority. NMM does not have discretionary authority as to the broker-dealer to be used. (See "**Item 12 – Brokerage Practices**"). "**Item 4 – Advisory Business**" provides additional information on limited discretionary authority.

Item 17 – Voting Client Securities

As a matter of firm policy and practice, NMM does not generally accept the authority to and does not vote proxies on behalf of advisory clients.

Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. Generally, clients receive proxies or other solicitations directly from the custodian or a transfer agent, and not from NMM.

NMM, however, may provide advice to you regarding your voting of proxies. Call us at (866) 688-0028 or submit your inquiry via-email to info@navigatormoney.com. Clients may obtain a copy of NMM's proxy voting policies and procedures upon request.

In certain circumstances, NMM may be required to vote proxies as part of its fiduciary duties to certain ERISA plans. In such instances, NMM will vote proxies in a manner consistent with the investors stated goals. Those clients may promptly obtain a copy of how proxies for plan shares were voted by contacting Mark Grimaldi directly.

Item 18 – Financial Information

Registered investment advisers are required in this item to provide you with certain financial information or disclosures about NMM's financial condition.

NMM does not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance.

Furthermore, NMM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.