



**Naples Asset Management Company®, LLC**  
**Registered Investment Adviser**

## **FIRM BROCHURE**

**Effective March 30, 2012**

**Naples Asset Management Company®, LLC**  
**23150 Fashion Drive, Suite 231**  
**Estero, Florida 33928**

**[www.NaplesAM.com](http://www.NaplesAM.com)**

**Telephone: 239.593.5525**  
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This Brochure provides information about the qualifications and business practices of Naples Asset Management Company®, LLC. ("NAMCO")

If you have any questions about the contents of this Brochure, please contact us at 239-593-5525. 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.

Naples Asset Management Company®, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Additional information about Naples Asset Management Company®, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Naples Asset Management Company®, LLC is 133978.

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#### **Item 4 - Description of Services and Fees**

Naples Asset Management Company®, LLC ("NAMCO") is a registered investment adviser based in Estero, Florida. We are organized as a limited liability company under the laws of the State of Florida. We have been providing investment advisory and consulting services since 2003. Currently, we offer the following investment advisory services:

- **Portfolio Management Services**
- **Retirement Plan Services**
- **Consulting Services**

#### **Portfolio Management Services**

NAMCO offers portfolio management services on a discretionary and non-discretionary basis. NAMCO may offer an initial complementary general consultation to discuss services available, needed and desired, and determine the suitability of a potential client-adviser relationship. Portfolio management services will only begin after the client and NAMCO have formalized the relationship with a signed Advisory Services agreement. Once the relationship is formalized, NAMCO and the client will share in a data gathering and discovery process in a joint effort to try to determine the client's personal needs, goals, intentions, time horizons, risk tolerance and investment objectives.

Portfolio management services involve ongoing and continuous portfolio management services that include, but are not limited to, risk management, investment policy, asset allocation, active or passive strategy, and performance monitoring. In the delivery of investment management services, NAMCO provides investment advisory services.

#### **NAMCO Select Portfolios**

Naples Asset Management Company has created, continually updates and manages a set of NAMCO Select Investment Portfolios. These Select Investment Portfolios are designed to be representative of the thought leadership that distinguishes NAMCO. Investment objectives range from aggressive income to aggressive growth, the Portfolios are well diversified and they utilize investment vehicles that have proven track records of adding value. Investment Advisor Representatives have the option of employing these "best-of-breed" Portfolios, thereby ensuring that clients receive outstanding investment management that is congruent with their goals and objectives.

With the input of each client, NAMCO will attempt to construct a diversified portfolio of investments that are within its realm of expertise. Additionally, based upon information provided by the client, NAMCO will prepare an evaluation of existing portfolio investments and provide recommendations to the client for other investments as appropriate.

Clients may provide instructions to NAMCO to refrain from investing in particular industries, invest in limited amounts of securities, and request that NAMCO issue checks or electronic fund transfers to or for the benefit of the client. The checks or fund transfers will be completed by the custodian, and sent directly to the client. NAMCO has no custody over client funds.

### **Types of Investment**

Depending on the needs of the clients, NAMCO may recommend listed securities, exchange traded shares, mutual funds, corporate bonds, U.S. Government securities, tax-exempt municipal bonds, and other fixed income securities.

### **Types of Investments Services**

NAMCO provides portfolio management, investment advisory and consulting services to individuals, high net worth individuals, corporate pension and profit-sharing plans, Taft-Hartley plans, charitable institutions, foundations, endowments, broker dealers, municipalities, registered mutual funds, private investment funds and trust programs.

NAMCO's advisory relationship is formalized at the time NAMCO and the client sign an Advisory Services Agreement.

### **Assets Under Management**

NAMCO manages \$61.8 million of client investment assets. \$35.7 million are managed on a discretionary basis and \$26.1 million on a non-discretionary basis. These amounts were calculated as of the date of this brochure.

### **Retirement Plan Services**

NAMCO may provide FLAT-FEE (no commission) advisory and fiduciary services for the following types of corporate retirement plans:

- 401(k)s
- 403(b)s
- Profit-sharing
- Defined benefit (pension)
- SEPs, SAR SEPs, KEOGHs, and Self-employed 401(k)s
- SIMPLE IRAs and SIMPLE 401(k)s
- Executive bonus arrangements
- Deferred compensation plans, including 457 plans

### **Among The Services NAMCO May Offer To Corporate Retirement Plan Clients**

- Plan analysis, design, and solution modeling
- Conduct and present a comparative analysis of the services and fees of multiple service providers
- Assist with the creation and ongoing implementation of an Investment Policy Statement for the Plan
- Conduct a regular and ongoing analysis and evaluation of the Plan investments per the terms of the plan's Investment Policy Statement

- Propose the removal and replacement of investment alternatives as needed per the terms of the Plan's Investment Policy Statement
- Serve as co-fiduciary with regard to ERISA requirements related to investment manager selection and monitoring
- Provide comprehensive education and consulting to participants

### Consulting Services

In addition to fee-based or flat-fee advisory services, NAMCO provides consultations offered at an hourly rate or fixed fee project rate. Project fees will generally be based upon NAMCO's hourly rate.

Consulting services are not ongoing in nature and terminate upon the conclusion of services. For investors, consulting services can be general in nature or focused on particular component, depending upon the client's needs. Advice is based upon information provided by the client. Topics and assistance may range from overall investment advisory questions, review of an existing portfolio, project, research and analysis, consultation regarding suitability or verification of statements as may otherwise be desired by the client. When consulting services is focused on certain areas of the client's interests or needs, the client's overall financial situation or needs may not be addressed due to the limited scope of the client's request.

NAMCO is also available to provide services to financial professionals and qualified investors, which may include consultation, research and analysis, private placement drafting, and other areas of assistance that may be desired. Services are provided hourly at \$400 or at a quoted project fee, dependent upon the nature and complexity of the project.

Clients are never obligated to utilize the services or companies that may be recommended by NAMCO. NAMCO may require a retainer in order to schedule projects. Fees or project balances for consultations are due and payable upon delivery of the services.

### Types of Consulting Services

- **Asset Management Consulting Services.** NAMCO may provide consulting services to registered investment advisors; FINRA members and bank trust departments on third party "turnkey" asset management platforms and investment managers.
- **Bank and Thrift Consulting Services.** NAMCO may also provide consulting services to banks and other lenders in the area of performing and/or non-performing debt positions and real estate owned (REO) being held within their lending institution. The disposition of these assets may provide additional financial balance or improvement of the cash on hand within a lender. Our consulting services may focus on redevelopment and value added strategies if needed.
- **Administrative Services.** NAMCO may also charge the issuer of a security an initial and or on-going administrative fee for consulting, accounting and administrative services. NAMCO may provide initial and ongoing consulting to business owners or issuers of private investment offerings.

## **Fees and Compensation** (Form ADV Part 2A, Item 5)

### **Item 5 – Fees and Compensation**

NAMCO's fees are negotiable. The specific manner in which fees are charged by NAMCO is established in a written Advisory Services agreement between NAMCO and the client.

Clients may elect to be billed in advance or arrears each calendar quarter. Clients may also elect to be billed directly for fees or to authorize NAMCO to directly debit fees from the client's account, in which case NAMCO would send an invoice directly to the qualified custodian holding the client's assets to have the fees deducted from the client's account. Fees will be based on a percentage of assets under management on the last trading day of the billable quarter.

The portfolio balance will be determined by the market value reported by the custodian. In the absence of a set market value, a value will be agreed upon between NAMCO and the client. A fee of 2.00% per annum will be charged for assets of up to \$50 million. Assets over \$50 million will be charged 1.50% per annum.

Advisory services fees shall be prorated for each capital contribution and withdrawal made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts opened or terminated during a calendar quarter will be charged a prorated fee based on the number of days advisory services were provided to the account during the calendar quarter. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be immediately due and payable.

Fees for advisory services may be modified in certain situations according to individual circumstances, the complexity of services required, pre-existing relationships, for family members of NAMCO, or at the discretion of NAMCO. Advisory services fees will not be "performance based" (based upon a share of capital gains or capital appreciation for any portion of funds under an advisory contract.)

## **Performance Based Fees and Side-By-Side Management** (Form ADV Part 2A, Item 6)

### **Item 6 – Performance-Based Fees and Side-By-Side Management**

Neither NAMCO nor its supervised person's charges performance based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

All fees for advisory services are determined by the percentage of assets under management in the client's account at the end of the billable quarter.

## **Types of Clients** (Form ADV Part 2A, Item 7)

### **Item 7 – Types of Clients**

NAMCO's clients are individual investors, retirement plans, broker dealers, banks, institutional clients, insurance companies, endowment funds, family offices, business owners and other institutional entities. We offer investment advisory services to these individuals and institutions.

In general, we require a minimum account size of \$1,000,000. At our discretion, we may waive this minimum account size. We may waive the minimum requirement if you are referred to us by an intermediary (Investment Advisor Representative, Registered Representatives or Investment Consultant) or if you appear to have significant potential for increasing your assets under our management. We may also combine account values for you and your children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum. We have the right to terminate this account if it falls below a minimum size, which, in our sole opinion, is too small to effectively manage.

<b>Methods of Analysis, Investment Strategies and Risk of Loss</b> (Form ADV Part 2A, Item 8)
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### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

NAMCO attempts to measure an investor's risk tolerance, time horizon, goals and objectives through an interview and data-gathering process in an effort to determine an investment plan or portfolio that best fits the investor's profile.

Numerous publicly available sources of economic, financial and investment research are used by NAMCO. Mutual fund recommendations are based on performance reports and analysis of managers obtained from common sources. Asset allocation software and historical performance modeling software may also be utilized.

Investment strategies may be based upon a number of concepts and determined by the type of investor. NAMCO's advice and recommendations are based upon information received from the client. Investing in securities involves risk of loss that clients should be prepared to bear. Such loss may result from inflation, deflation, interest rate, default, terrorism and other unknown risks that could affect investment market values, liquidity and cash flow for investments.

Clients may choose to have NAMCO implement a portfolio strategy that includes a combination of passive and actively managed investment styles. The asset allocation strategy designed is based on each client's stated timeframe and risk tolerance. Portfolios are diversified in various asset classes, reviewed quarterly and rebalanced per the client's direction or at NAMCO's discretion.

NAMCO's recommended portfolio allocation and holdings may change based on market conditions and the attractiveness of individual holdings. Assessment of the market's strength/weakness as defined by institutional investing trends, performance of leading stocks, sector leadership as well as numerous other factors help determine the asset classes allocation of the portfolio.

NAMCO may consider investments in individual security issues and may recommend the purchase or sale of individual issues. The investment plan will contain assets in classes that NAMCO believes, based upon historical data, have attractive combinations of return, risk and correlation. Emphasis will be placed on optimizing performance of the portfolio while attempting to control risk.

NAMCO provides advisory services for portfolios ranging from aggressive to conservative, designed to meet the varying needs of the investors. Clients select the portfolio best suited to their individual needs.

### **Risk of Loss**

Investing in securities 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 will be met. Past performance is in no way an indication of future performance.

## **Disciplinary Information** (Form ADV Part 2A, Item 9)

### **Item 9 – Disciplinary Information**

NAMCO is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of NAMCO or the integrity of NAMCO's management. Neither NAMCO nor its management persons has been involved in any legal or disciplinary events involving a criminal or civil action in a domestic, foreign or military court of competent jurisdiction, an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, any foreign financial regulatory authority, or a self-regulatory organization proceeding.

## **Other Financial Industry Activities and Affiliations** (Form ADV Part 2A, Item 10)

### **Item 10 – Other Financial Industry Activities and Affiliations**

Investment Advisory Representatives may be affiliated with a FINRA member broker dealer and disclose any such affiliation. Paul McIntyre is the registered principal of MSC-BD, LLC.

Investment Advisory Representatives may suggest that advisory clients place transactions through MSC-BD, LLC. If client transactions are executed through MSC-BD, LLC Investment Advisory Representatives may receive normal commissions, thus creating a conflict of interest between NAMCO's management persons and its clients. Any suggestion must be suitable and meet a client's objectives and profile.

NAMCO may recommend unaffiliated third party separate account managers that may offer investment programs that may help clients to meet their stated objectives.

Clients are never under any obligation to use a service or firm that may be recommended. At the time of the recommendation, NAMCO will deliver to the client the third party manager's ADV Part 2 or substitute brochure, compensation disclosure and any other information that may be required by securities rules and regulations.

Clients are never under any obligation to purchase products that are recommended through NAMCO or other financial services providers.



### **Item 11 – Code of Ethics**

NAMCO has adopted a Code of Ethics (the “Code”) for all supervised persons of the firm describing its high standard of business conduct and fiduciary duty to its clients. The Code includes provisions relating to the confidentiality of client information, prohibition on insider trading, prohibition of rumor mongering, restrictions on the acceptance of significant gifts of amounts exceeding \$100 dollars, reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at NAMCO must acknowledge the terms of the Code annually, or as amended.

The Code is designed to assure that the personal securities transactions, activities and interests of the employees of NAMCO will not interfere with NAMCO’s duty to (i) make decisions that are in the best interest of its advisory clients and (ii) implement such decisions while, at the same time, allowing employees to invest for their own accounts.

NAMCO anticipates that, in appropriate circumstances, consistent with the client’s investment objectives, it will cause accounts over which NAMCO has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which NAMCO, its affiliates, directly or indirectly, have a position of interest.

NAMCO’s employees and persons associated with NAMCO are required to follow NAMCO’s Code. Subject to requirements of the Code officers, directors and employees of NAMCO and its affiliates may trade for their own accounts in securities, which are recommended to and/or purchased or sold for NAMCO’s clients.

Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with NAMCO’s duties to act in the best interest of its clients. In addition, the Code requires pre-clearance of many transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. As a result, employee trading is continually monitored to reasonably prevent conflicts of interest between NAMCO and its clients.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with NAMCO’s obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price. NAMCO will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated on a pro rata basis. Any exceptions will be explained on the Order.

A copy of NAMCO’s Code of Ethics will be provided to any client or prospective client upon request. Client or prospective clients may also obtain a copy at [www.NaplesAM.com](http://www.NaplesAM.com)

## **Brokerage Practices** (Form ADV Part 2A, Item 12)

### **Item 12 – Brokerage Practices**

Soft dollar benefits are not limited to those clients who may have generated a particular benefit although certain soft dollar allocations are connected to particular clients or groups of clients.

## **Review of Accounts** (Form ADV Part 2A, Item 13)

### **Item 13 – Review of Accounts**

Each client's financial statements and investments are reviewed on an annual or more frequent basis. We discuss each client's financial situation (losses, gains, purchases, sales, investment goals, etc.) We make the required adjustments to the client's portfolio based on the client's financial situation, investment objectives and risk tolerance. Each Investment Advisor Representative is responsible for their client account reviews which are based upon a variety of factors, including routine time-based triggers as well as securities holdings and investment objective related issues.

Clients also receive monthly statements from Fidelity Investments, where their consolidated accounts of assets are held. If Fidelity Investments deems the accounts to have had "no activity" for a particular month, Fidelity Investments will send no statement for the month in question.

## **Client Referrals and Other Compensation** (Form ADV Part 2A, Item 14)

### **Item 14 – Client Referrals and Other Compensation**

NAMCO may enter into referral fee arrangements with duly registered persons or firms, or persons or firms exempt from registration. Under the terms of the referral arrangement, NAMCO compensates the referral source when referrals are provided to NAMCO. These fees will either be paid in the form of a one-time fee or based upon a percentage of the value assets of the referred Client.

Such referral relationships do not affect the fees that clients pay to NAMCO. In each instance appropriate disclosure documents would be delivered to prospective clients at the time of the referral, as required by the rules and regulations of the Investment Advisers Act of 1940, as amended.

## **Custody** (Form ADV Part 2A, Item 15)

### **Item 15 – Custody**

NAMCO does not have custody of clients' assets. Clients receive monthly or quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. NAMCO urges you to carefully review such statements and compare such custodial records to the account statements that NAMCO may provide to you. NAMCO's statements may vary from custodial

statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

## **Investment Discretion** (Form ADV Part 2A, Item 16)

### **Item 16 – Investment Discretion**

NAMCO may receive 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 objectives and risk tolerance for the particular client account. NAMCO's discretionary authority does not include the withdrawing of funds or securities from the client's account.

When selecting securities and determining amounts, NAMCO observes the client's written investment policies, limitations and restrictions. For registered investment companies, NAMCO's authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor longer term holding of investments once made.

## **Voting Client Securities** (Form ADV Part 2A, Item 17)

### **Item 17 – Voting Client Securities**

As a matter of firm policy and practice, NAMCO 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 the client's portfolio. NAMCO may provide advice to clients regarding the client's voting of proxies.

## **Financial Information** (Form ADV Part 2A, Item 18)

### **Item 18 – Financial Information**

In this Item 18 NAMCO is required to provide you with certain financial information or disclosures about its financial condition. NAMCO has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has never been the subject of a bankruptcy proceeding.

## **Requirements for State Registered Advisers** (Form ADV Part 2A, Item 19)

### **Item 19 – Requirements for State Registered Advisers**

NAMCO is a registered investment advisor with the SEC. The President of the firm is Paul J. McIntyre who also serves as its Chief Compliance Officer. Bryan Smith is NAMCO's Director of Asset Management and Director of Retirement Services. Jack Reynoldson, John Ruff, Walter Hester III, Dr. Robert Lovett are Senior Portfolio Managers with portfolio management responsibilities.

As of the date of this Firm Brochure, NAMCO is licensed in the following states: CA, CO, FL, GA, HI, IL, LA, MI, MS, NH, NC, NJ, OH, SC, TX and WI.

Investment Advisory Representatives of NAMCO will have experience in investment consulting, investment management and/or a brokerage background. In considering candidates, NAMCO prefers several years of industry experience with weight being given to those with a college degree and/or advanced industry designations (CRC, CRA, CRPS, RF, CFP, CFA, CIMC, PFS, CIMA or CPA).

## **Additional Information** (Form ADV Part 2A, Item 20)

### **Item 20– NAMCO’S Principal Executive Officers and Management Persons**

#### **PAUL J. MCINTYRE**

**CHIEF EXECUTIVE OFFICER, CHIEF OPERATING OFFICER & COMPLIANCE OFFICER**

Born: 1951

#### **Examinations and Professional Designations**

- FINRA: Series 7 (General Securities)
- Series 99 (Financial Operations Principal)
- Series 79 (Mergers and Acquisitions)
- Series 24 (General Securities Principal)
- Series 63 (Blue Sky Law)
- NASAA: Series 65 (Investment Adviser Law)
- Florida Life Variable Annuity and Health License

#### **Post-Secondary Education**

- International Foundation for Retirement Education (InFRE). Certified Retirement Counselor Certification (CRC) Program. 2003
- Dorsey Wright Technical Institute, Point and Figure Charting Certification. 2002
- George Washington University, Washington, DC. Certified Investment Consultants Program, (CIMC). 2001
- Merrill Lynch Pierce Fenner & Smith, NY, NY. Donald T. Regan Certification Program, Certified Financial Manager Program (CFM). 1983
- Life Underwriter Training Courses I & II. Southfield, Michigan (LUTC). 1979
- Michigan State University, East Lansing, College of Education. Property Casualty, Life and Disability Insurance Licensing & Training Certification. 1978
- Eastern Michigan University, Ypsilanti, Michigan B.S. Business Education. 1978

#### **Business**

- Naples Asset Management Company®, LLC: Estero, Florida. Chief Executive Officer, Chief Operating Officer and Chief Compliance Officer. Registered Investment Adviser: 2005 – Present
- Cyndi McIntyre Real Estate, LLC: Estero, Florida, Vice President. Licensed Florida Real Estate Agent, Real Estate Development 1998 – Present
- MSC-BD, LLC: Estero, Florida, COO, and CCO. FINRA Broker Dealer, Member of SIPC: 2006 – Present
- FINRA Dispute Resolution: Arbitrator for financial industry client and firm dispute matters. 2002 – Present

- Registered Principal/Representative: for FINRA member broker/dealer firms 1979 - 2002
- Continuing Education Provider: (CPE) for CPA's, Attorney's (CLE) and Insurance Agents 1985-2012

## JOHN R. REYNOLDSON

**PRESIDENT & MANAGING DIRECTOR**

**Born: 1953**

### Examinations and Professional Designations

- FINRA: Series 7 (General Securities)
- Series 63 (Blue Sky Law Exam)
- NASAA: Series 65 (Investment Adviser Law)
- FINRA: Series 3 (National Commodities and Futures)
- Florida Life, Variable Annuity and Health License

### Post-Secondary Education

- University of Wisconsin – Madison. M.B.A. (Finance) 1977
- University of Wisconsin – Madison. B.B.A. (Finance) 1975

### Business

- Naples Asset Management Company®, LLC: Estero, Florida. President: 2011 - Present
- JRSY Partners LLC: Naples, Florida. Managing Member: 2010 – 2012.
- Nye Wealth Management LLC: Naples, Florida. Chief Executive Officer: 2009 – 2011.
- JP Morgan Chase: Naples, Florida. Senior Investment Advisor: 2008 – 2009.
- Morgan Stanley: Houston, Texas and Chicago, Illinois. Executive Director: 1987 – 2008
- Chicago Board Options Exchange: Member: 1981 – 1987
- First National Bank of Chicago: Chicago, Illinois. Trust Officer and Portfolio Manager. 1979-1981.
- Madison Investment Advisors: Madison, Wisconsin. Vice President and Registered Investment Advisor: 1977 - 1979

## ROBERT D. LOVETT

**MANAGING DIRECTOR**

**Born: 1947**

### Examinations and Professional Designations

- Series 63 (Blue Sky Law Exam)
- NASAA Series 65 (Investment Adviser Law)

### Post-Secondary Education

- Nova Southeastern University. D.B.A. (Accounting) 2002
- Seton Hall University. M.S. (Taxation) 1986
- Northeastern University. B.S. (Business Administration) 1971
- CFP®, CERTIFIED FINANCIAL PLANNER™. College for Financial Planning, 1989

### Business

- Naples Asset Management Company®, LLC: Estero, Florida. Managing Director: 2011 – Present
- Piedmont Investment Advisors, LLC: Bonita Springs, Florida. Director: 2006 - 2011

- Global Wealth Advisors, Inc.: Naples, Florida. Managing Director: 2005 – 2006
- Astwell Consulting: Coral Springs, Florida and Naples, Florida. Managing Partner: 1999-2005
- R.D. Lovett, CFP®: Coral Springs, Florida. Owner: 1991 – 1999
- Paine Webber: Rumson, NJ and Fort Lauderdale, Florida. Investment Executive: 1989 – 1991
- R.D. Lovett: Rumson, NJ. Owner. 1971 - 1989.

## **Educational**

- Edison State College, Fort Myers, Florida. Adjunct Professor: 2011- Present
- Florida Gulf Coast University, Estero, Florida. Program Director and Lead Instructor. 2001 – 2010
- Barry University, Miami, Florida. Program Director and Lead Instructor. 2003 – 2007
- Florida State University, Tallahassee, Florida. Regional Program Director: 2000 – 2001
- Nova Southeastern University, Fort Lauderdale, Florida. Director: 1996 – 2000. Adjunct Professor: 1991 – 1996.
- Rollins College, Winter Park, Florida. Adjunct Faculty and Academics Coordinator. 1995 – 1996
- College for Financial Planning (Florida Atlanta University), Boca Raton, Florida. Adjunct Faculty: 1991 - 1996
- Florida Metropolitan University, Fort Lauderdale, Florida. Adjunct Faculty: 1990 - 1993
- Monmouth University, Long Beach, New Jersey. Adjunct Faculty: 1984 – 1990

## **BRYAN E. SMITH**

**DIRECTOR OF ASSET MANAGEMENT**

**DIRECTOR OF RETIREMENT SERVICES**

Born: 1969

## **Examinations and Professional Designations**

- FINRA Series 7 (General Securities Representative)
- NASAA Series 65 (Investment Adviser Law Exam)
- College for Financial Planning: Chartered Retirement Plan Specialist designee (CRPS)
- Florida Life and Variable Annuity License

## **Post-Secondary Education**

- College for Financial Planning: Chartered Retirement Plan Specialist designee (CRPS) 2008
- Lake Erie College. International Business. 1991 - 1992
- Lakeland Community College. Business. 1988 - 1990

## **Business**

- Naples Asset Management Company, LLC, Estero, Florida, Director of Asset Management and Retirement Plan Services. From 2008 to Present.
- MSC-BD, LLC: Estero, Florida, Registered Representative. FINRA Broker Dealer Member of SIPC 2008 – Present
- UBS Financial Services, Inc., Ft Myers, Florida, Registered Representative 2007 – 2008
- Key Banc Capital Markets Inc. Florida, Registered Representative 2006 – 2007

- Registered Representative/ Licensed Insurance Agent: for FINRA member Broker/Dealers and insurance companies 1992 – Present

## **JOHN M. RUFF**

**SENIOR PORTFOLIO MANAGER**

**Born: 1947**

### **Examinations and Professional Designations**

- FINRA: Series 7 (General Securities)
- NASSA: Series 66 (Investment Adviser Law)

### **Post-Secondary Education**

- CBOE Options Institute Graduate 1995
- Dorsey Wright Technical Institute, Point and Figure Charting Certification 2007
- DeVry Institute of Technology 1983

### **Business**

- Naples Asset Management Company®, LLC: Estero, Florida, Senior Portfolio Manager. 2008 - Present.
- UBS Financial Services, Inc: Ft Myers, Florida Vice-President. 2007 - 2008.
- McDonald Investments, Inc: Beechwood, Ohio Vice-President. 1992 - 2007.
- Dean Witter Reynolds: Chagrin Falls, Ohio Vice-President. 1984 - 1992.

## **WALTER M. HESTER III**

**SENIOR PORTFOLIO MANAGER**

**Born: 1963**

### **Examinations and Professional Designations**

- FINRA Series 7 (General Securities)
- FINRA Series 63 (Blue Sky Law)
- NASSA Series 65 (Investment Adviser Law)

### **Post-Secondary Education**

- Registered Financial Engineer (The Institute of Financial Engineering) 2002
- Hinds Community College 1986

### **Business**

- Naples Asset Management Company®, LLC: Estero, Florida. 2010 - Present
- MSC-BD, LLC: Estero, Florida, Registered Representative. FINRA Broker Dealer. 2010 - Present
- Wallstreet Financial Services Inc.: Miami, Florida. 2007-2009
- Newbridge Securities Inc.: Ft. Lauderdale, Florida. 2005-2007
- Registered Representative: for various Broker Dealer firms. 1996-2005

## **CHRISTOS J. ATHANS**

## **PORTFOLIO CONSULTANT**

**Born: 1956**

### **Examinations and Professional Designations**

- FINRA Series 4 (Options Principal)
- FINRA Series 7 (General Securities)
- FINRA Series 24 (General Securities Principal)
- FINRA Series 63 (Blue Sky Law)
- NASAA Series 65 (Investment Adviser Law)
- Florida Life and Variable Annuity License

### **Post-Secondary Education**

- Babson College, Wellesley, Massachusetts. BS – Finance. 1978

### **Business**

- Naples Asset Management Company®, LLC: Estero, Florida. Portfolio Consulting. 2010 to Present.
- MSC-BD, LLC: Estero, Florida. FINRA Broker Dealer, Member of SIPC. 2006 – Present
- State Wide Family Insurance Services, Sarasota, Florida. Life Insurance Sales. 2004 - 2006
- Registered Representative/ Licensed Insurance Agent: for FINRA member Broker/Dealers and insurance companies 1992 – Present

## **Alfred J. DiNicola**

### **DIRECTOR OF REO SERVICES**

**Born: 1949**

### **Examinations and Professional Designations**

- Series 22 (Direct Participation Program)
- Series 66 (Investment Adviser Law)

### **Post-Secondary Education**

- The College of New Jersey. Bachelor's Degree/Education. 1971
- The College of New Jersey. Masters Degree/ Education. 1974
- Rowan State University. Administration & Supervisions Certification 1975

### **Business**

- Naples Asset Management Company®, LLC. Director of REO Services, Estero, Florida, 2006 to Present.
- MSC-BD, LLC: Estero, Florida, Registered Representative. FINRA Broker Dealer. 2005 – Present
- The Pinnacle Performance Group, Inc: CEO - Business management and consulting. October 1994 to Present.
- Pinnacle Performance Investments, LLC: Alternative Investment Strategies. April 2008 to Present.
- Pelican I Real Estate & Development, Inc. Licensed Florida Real Estate Broker. Real Estate development services for bank owned developments, builders and developers. January 2005 to Present.



## **Eric A. (Rick) Nye**

**Portfolio Consultant**

**Born: 1962**

### **Examinations and Professional Designations**

- FINRA Series 24 (General Securities Principal)
- FINRA Series 7 (General Securities Representative)
- FINRA Series 63 (Blue Sky Law)
- State of Ohio Variable Annuities - 1995
- State of Ohio Accident/Health/Life - 1987
- Non-resident insurance licenses currently held in Florida and North Carolina

### **Post-Secondary Education**

- University of South Florida, Tampa FL - Political Science 1993
- American College, Bryn Mawr PA - Chartered Financial Consulting (ChFC)
- American College, Bryn Mawr PA - Chartered Life Underwriter (CLU) 2002
- American College, Bryn Mawr PA - Chartered Advisor for Senior Living (CASL) 2008

### **Business**

- Naples Asset Management Company®, LLC. Portfolio Consultant, Estero, Florida, 2012 to Present.
- Nye Financial Group, Inc.: Hudson, Ohio, President & Co-Owner. Financial Planning and Insurance Consulting. 1991 – Present
- Longevity Capital, LLC - Hudson, OH, Registered Representative FINRA Broker Dealer 2011 to Present.
- EAN Agency, LLC – Member, Licensed Ohio Insurance Agency.
- Registered Representative/ Licensed Insurance Agent: for FINRA member Broker/Dealers and insurance companies 2003 – Present

## EXHIBITS

### Privacy Policy:

The firm's Privacy Policy is below and is distributed to Clients annually. It is also available all times through the Company's website, [www.NaplesAM.com](http://www.NaplesAM.com)



**Naples Asset Management Company®, LLC**

### **PRIVACY POLICY 2012**

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Providers of personal financial and tax services are required by law to inform their clients of their policies regarding privacy of client information. This notice is being provided to you to specify the privacy policies and procedures that we have implemented to safeguard your nonpublic personal information.

#### **INFORMATION WE COLLECT**

The firm will collect nonpublic personal information about you that is provided to us by you or obtained by us with your authorization. Nonpublic personal information means personally identifiable information and any list, describing or other grouping of consumers that is derived using any personally identifiable financial information that is not publicly available.

#### **INFORMATION WE DISCLOSE**

The firm does not disclose any nonpublic personal information obtained in the course of our practice about our clients or former clients to anyone, except as required or permitted by law, or unless specifically requested by you. Permitted disclosures include, for instance, providing information to members of the firm, and in limited situations, to unrelated third parties who need to know that information to assist us in providing services to you. In all situations, we stress the confidential nature of the information being shared.

#### **CONFIDENTIALITY AND SECURITY**

We retain records relating to professional services that we provide so that we are better able to assist you with your professional needs, and in some cases, to comply with professional guidelines. In order to protect your nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with professional standards.

If you have any questions, because of privacy, our professional ethics, and the ability to provide you with quality financial services please call us at (239) 593-5525 or by email [pmcintyre@NaplesAM.com](mailto:pmcintyre@NaplesAM.com).

## Business Continuation Plan

The firm's Business Continuation Plan is below and is distributed to Clients annually. It is also available all times through the Company's website, [www.NaplesAM.com](http://www.NaplesAM.com)



### NAPLES ASSET MANAGEMENT COMPANY LLC

#### BUSINESS CONTINUITY PLAN 2012

NAMCO has developed a Business Continuity Plan on how we will respond to events that significantly disrupt our business. Since the timing and impact of disasters and disruptions is unpredictable, we will have to be flexible in responding to actual events as they occur. With that in mind, we are providing you with this information on our business continuity plan.

**Contacting Us** – If after a significant business disruption you cannot contact us as you usually do at (239) 593 5525 you should go to our web site at [www.naplesam.com](http://www.naplesam.com). If you cannot access us through these means, you should contact our clearing firm [www.Fidelity.com](http://www.Fidelity.com) for instructions on how they may provide prompt access to funds and securities, enter orders and process other trade-related, cash, and security transfer transactions.

**Our Business Continuity Plan** – We plan to quickly recover and resume business operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, protecting the firm's books and records, and allowing our customers to transact business. In short, our business continuity plan is designed to permit our firm to resume operations as quickly as possible, given the scope and severity of the significant business disruption. Our business continuity plan addresses: data back up and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank and counter-party impact; regulatory reporting; and assuring our customers prompt access to their funds and securities if we are unable to continue our business. Our clearing firm, Fidelity, backs up our important records in a geographically separate area.

While every emergency poses unique problems based on external factors, such as time of day and the severity of the disruption, our clearing firm has advised us that their objective is to restore their own operations and be able to complete existing transactions and accept new transactions and payments within four hours. Your orders and requests for funds and securities could be delayed during this period.

**Varying Disruptions** – Significant business disruptions can vary in their scope, such as only our firm, a single building housing our firm, the business district where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. In a disruption to only our firm or a building housing our firm, we will transfer our operations to a local site when needed and expect to recover and resume business within four hours. In a disruption affecting our business district, city, or region, we will transfer our operations to a site outside of the affected area, and recover and resume business within the same day. In either situation, we plan to continue in business, transfer operations to our clearing firm if necessary, and notify you through our web site [www.naplesam.com](http://www.naplesam.com) how to contact us. If the significant business disruption is so severe that it prevents us from remaining in business, we will assure our customer's prompt access to their funds and securities.

**For more information** – If you have questions about our business continuity planning, you can contact us at (239) 593 5525 or at [www.naplesam.com](http://www.naplesam.com).



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[www.NaplesAM.com](http://www.NaplesAM.com)