

Navitas Investment Advisory Services, LLC
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Form ADV Part 2A – Firm Brochure

March 3, 2014

This Brochure provides information about the qualifications and business practices of Navitas Investment Advisory Services, LLC. If you have any questions about the contents of this Brochure, please contact us at 601-991-2830. 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.

Navitas Investment Advisory Services, LLC is a registered as an Investment Adviser with the State of Mississippi. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Navitas Investment Advisory Services, LLC will be available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Since the last filing of Form ADV Part 2A, dated November 8, 2013, Navitas Wealth Advisors has bifurcated its service offering and in turn have created a new entity, Navitas Investment Advisory Services, LLC, to provide continuing advisory services.

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	6
Item 7: Types of Clients	6
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	6
Item 9: Disciplinary Information	6
Item 10: Other Financial Industry Activities and Affiliations	7
Item 11: Code of Ethics	7
Item 12: Brokerage Practices	8
Item 13: Review of Accounts	9
Item 14: Client Referrals and Other Compensation	9
Item 15: Custody	9
Item 16: Investment Discretion	10
Item 17: Voting Client Securities	10
Item 18: Financial Information	10
Item 19: Requirements for State-Registered Advisers	10

Item 4: Advisory Business

Description of Advisory Firm

Navitas Investment Advisory Services, LLC (“NIAS”) is an Investment Adviser registered with the State of Mississippi. NIAS is a LLC formed under the laws of the State of Mississippi in 2014. George Hester owns 100% of NIAS, and acts as Chairman and Chief Executive Officer. As of the date of this ADV Part 2A, we manage \$37,923,000 on a discretionary basis.

Types of Advisory Services

Investment Supervisory Services

From time to time NIAS offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. NIAS creates an Investment Policy Statement for each client, which outlines the client’s current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client’s specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy • Personal investment policy
- Asset allocation • Asset selection
- Risk tolerance • Regular portfolio monitoring

Selection of Other Advisers

NIAS may, from time to time, direct clients to other third party investment advisors (“Outside Manager”) for investment management services. The Outside Manager is paid a portion of NIAS’s advisory fee, and this fee arrangement is disclosed in the joint advisory agreement between NIAS, the Outside Manager, and the client. The fees shared will not exceed any limit imposed by any regulatory agency. Before selecting other advisors for clients, NIAS will always ensure those other advisers are properly licensed or registered as investment advisers.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees and Compensation

Standard Advisory Fee

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Household Assets Under Management	Annual Advisory Fee
\$0-\$3,000,000	1.00%
\$3,000,001 - \$5,000,000	0.95%
\$5,000,001 - \$10,000,000	0.90%
\$10,000,001 - \$30,000,000	0.75%
\$30,000,001 - \$50,000,000	0.60%
\$50,000,001 - \$100,000,000	0.50%
Above \$100,000,000	0.30%

The annual fees are negotiable in certain cases and are generally pro-rated and paid in advance on a quarterly basis. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least one month in advance. Upon termination of any account, any unearned fee will be rebated to the client. Any Outside Manager used will be compensated out of the fee collected by NIAS.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients 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 fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

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

NIAS does not manage accounts using a performance-based fee in order to avoid conflicts of interests that could result by favoring accounts where management fees have the potential to be substantially higher.

Item 7: Types of Clients

We provide investment advisory services to Individuals, pension plans, profit sharing plans, trusts, estates, charitable organizations, corporations and other business entities.

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

Method of Analysis in relation to the firm involves deciding who the outside manager will be. The outside manager will employ various methods of analysis of its own in the course of providing the actual management services. Please see Item 8 of the Outside Manager's Form ADV Part 2A for further discussion on analysis and risk.

All investing strategies we offer involve risk and may result in a loss of your original investment.

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 NIAS or the integrity of our management. We have no information applicable to this Item.

Item 10: Other Financial Industry Activities and Affiliations

Mr. Hester is a registered representative of Coker & Palmer, a FINRA registered broker/dealer (CRD Number 29163). As a result of this affiliation, Mr. Hester accepts compensation for the sale of insurance, securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. This practice presents a conflict of interest and gives us an incentive to recommend investment products based on the compensation received, rather than on a client's needs. The firm will recommend no-load mutual funds in certain circumstances. Clients have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with us. The firm charges firm fees and Mr. Hester may receive commission income as a result of product sales. Firm fees are not off-set by commission income.

Item 11: Code of Ethics

The firm has updated a written Code of Ethics in compliance with SEC Rule 204A-1. The Code of Ethics sets forth the firm's standards of conduct and requires compliance with federal securities laws... Our code of ethics also addresses personal trading and requires our personnel to report their person securities holdings and transactions to the Chief Compliance Officer of the firm, Steven Rutledge. We will provide a copy of our code of ethics to any client or prospective client upon request.

It is further noted that Firm is in and shall continue to be in total compliance with the Insider Trading and Securities Fraud Enforcement Act of 1988. Specifically, Firm had adopted a firm wide policy statement outlining insider trading compliance by Firm and its associated persons, and other employees. This statement has any distributed to all associated persons and other employees of applicant, and has been signed and dated by each such person. A copy of such firm wide policy is left with such person and the original is maintained in master file. Further, Firm has adopted a written supervisory procedures statement highlighting the steps, which shall be taken to implement the firm wide policy. These materials are also distributed to all associated persons and to other employees of applicant, are signed, date and filed with the insider trading compliance materials. There are provisions adopted for restricting access to files, providing continuing education, restricting and/or monitoring trading on those securities of which applicant's employees may have non-public information, requiring of all applicant's employees who conduct their trading to a specific broker, or reporting all transactions promptly to Firm and monitoring the securities trading of the firm and its employees and associations persons.

Firm or individuals associated with the Firm may buy or sell securities identical to those recommended to customers for their personal account. It is the express policy of Firm that no associated person employed by Firm may purchase or sell any security prior to a transaction being implemented for an advisory account; therefore preventing such employees benefiting from transactions placed on behalf of advisory accounts.

Firm or any related person may have an interest or position in a certain security, which may also be recommended to a client. As these situations may represent a conflict of interest, Firm has established the following restrictions in order to insure its fiduciary responsibilities:

1. A director, officer, or employee of Firm shall not buy or sell securities for their personal portfolio where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. No associated person of Firm shall prefer his or her own interest to that of the advisory client.
2. Firm maintains a list of all securities holdings for himself and anyone associated with this advisory practice. These holdings are reviewed on a regular basis by Steven Rutledge, Chief Compliance Officer.
3. Firm requires that all individuals must act in accordance with all applicable federal and state regulations governing registered investment advisory practices.
4. Any individual not observing the above may be subject to termination.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker/Dealers

For the selection of custodians and/or Broker/Dealers, our general guiding principle is to obtain the best overall execution for each client in each trade, which is a combination of price and execution. With respect to execution, we consider a number of judgmental factors, including, without limitation, the actual handling of the order, the ability of the broker to settle the trade promptly and accurately, the financial standing of the broker, the ability of the broker to position stock to facilitate execution, our past experience with similar trades and other factors that may be unique to a particular order.

Recognizing the value of these judgmental factors, we may recommend or select brokers who charge a brokerage commission that is higher than the lowest commission that might otherwise be available for any given trade.

Our preferred custodian was chosen based on their relatively low transaction fees, quality of operations and access to a wide range of mutual funds, ETFs and markets. We do not charge a premium or commission on transactions, beyond the actual cost imposed by the Custodian. If a client wishes, and subject to technology and operational constraints, we may consider advising on accounts held with a custodian of their choice.

1. Research and Other Soft-Dollar Benefits

We do not receive benefits from broker/dealers that are often referred to in the industry as soft dollar benefits. When the firm uses client brokerage commissions to obtain these benefits, it is receiving an added benefit in that it does not need to produce or pay for the benefits that it receives. This leads an Adviser to have an incentive to select or recommend a broker-dealer based on our interest in receiving those benefits, rather than on our client's receiving most favorable execution.

We currently do not receive soft dollar benefits.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and that this may cost clients money over using a lower-cost custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Aggregation of client trades (block trading) is done at the discretion of the sub-adviser.

Item 13: Review of Accounts

In relation to asset management clients, continuous reviews are conducted by both Mr. Hester and the Outside Managers and a report is transmitted directly to the advisory client by the qualified custodial firm at least on a quarterly basis. Quarterly reviews and annual reviews are conducted. NIAS does not create written reports for clients.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly from any third party for advice rendered to our clients.

We may enter into agreements with various independent solicitors that refer clients to us. Fees that we charge clients introduced by solicitors will not be greater than fees we charge our advisory clients who were not introduced by solicitors and who have similar portfolios under our management. We will compensate the solicitor with a portion of the advisory fee we receive from the introduced client.

Item 15: Custody

Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets.

Item 16: Investment Discretion

NIAS is considered to have investment discretion due to the fact that it has the ability to hire and fire outside managers without first obtaining client consent.

Item 17: Voting Client Securities

NIAS does not vote proxies for clients. Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets.

Item 18: Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and have not been the subject of a bankruptcy proceeding. Furthermore, under no circumstance will we earn fees in excess of \$500 more than six months in advance of services rendered.

Item 19: Requirements for State-Registered Advisers

George Hester

Born: 1949

Educational Background

- 1971 – B.S. Agriculture, Mississippi State University

Business Experience

- 02/2014 – Present, Navitas Investment Advisory Services, LLC, Chairman and CEO
- 05/2000 – Present, Navitas Wealth Advisors, Inc., Chairman and CEO
- 04/2010 – Present, Coker and Palmer, Inc. – Registered Representative
- 03/1976 – Present, The Hester Group, PA, Manager
- 03/2009 – 12/2009, American Securities, Inc. – Registered Representatives
- 04/2000 – 01/2009, e-Planning Securities Inc., Registered Representative
- 01/1976 – 01/2001, Hester Advisory Group, President
- 08/1998 – 04/2000, NFP Securities, Registered Representative

Other Business Activities

Mr. Hester currently serves as Chairman and CEO of Navitas Wealth Advisors, Inc., which engages in all forms of comprehensive planning, including, but not limited to estate and wealth transfer planning, family coaching, and personal development, philanthropic and legacy planning, business succession and strategy planning, as well as insurance planning. Mr. Hester spends approximately 50% of his time in this role.

Mr. Hester is licensed to sell insurance products and has relationships with such carriers as John Hancock, ING, Met Life, Lincoln National, Lincoln Benefit Life, American General, Pacific Life, Hartford, and others. As a result of such sales activity, there is a potential conflict of interest.

Mr. Hester are registered representatives of Coker & Palmer, a FINRA registered broker/dealer (CRD Number 29163). As a result of this affiliation, he accepts compensation for the sale of insurance, securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds. 1. This practice presents a conflict of interest and gives us an incentive to recommend investment products based on the compensation received, rather than on a client's needs. This creates a conflict of interest. The firm will recommend no-load mutual funds in certain circumstances 2. Clients have the option to purchase investment products that we recommend through other brokers or agents that are not affiliated with us. 3. The firm charges firm fees Mr. Hester may receive commission income as a result of product sales. Firm fees are not off-set by commission income.

George Hester is involved in farming activities.

Performance Based Fees

We do not offer performance-based fees.

Material Disciplinary Disclosures

No management person at NIAS has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Please see above note concerning Mr. Hester's relationship with Coker & Palmer.