

DAC Asset Management LLC
1575 Clermont Drive #202
Naples, FL. 34109
Phone 239-260-5970

PART 2A of FORM ADV
FIRM BROCHURE

DAC Asset Management is an SEC registered Investment Advisor. Please note this does not imply a certain level of skill or training. However, our firm requires that the Principal holds at least a college degree and has appropriate experience in investments and or financial matters. This brochure provides information about the qualifications and business practices of DAC Asset Management LLC. If you have any questions about the contents of this brochure, please contact us at 239-260-5970. The information provided in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about DAC Asset Management is also available on the SEC's website at www.adviserinfo.sec.gov

August 01, 2015

Form ADV Part 2 Client Brochure

Item 2 Material Changes

Updated and amended Form ADV Part 2A in a narrative brochure format.

Updated and Amended Form Part 1A ADV.

Updated and Amended Compliance Manual.

DAC Asset Management LLC
Firm Brochure –Part 2A of Form ADV

Item 3	Table of Contents	Page
	Client Brochure	1
	Item 2 Material Changes	2
	Item 3 Table of Contents	3
	Item 4 Advisory Business	4
	Item 5 Fees and Compensation	4, 5
	Item 6 Performance based fees and Side by Side Management	5
	Item 7 Types of Clients	5
	Item 8 Methods of Analysis, Investment Strategies and Risk of Loss	5
	Item 9 Disciplinary Information	5
	Item 10 Other Financial Industry Activities and Affiliations	5
	Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	6
	Item 12 Brokerage Practices	6
	Item 13 Review of Accounts	6
	Item 14 Client Referrals and Other Compensation	7
	Item 15 Custody	7
	Item 16 Investment Discretion	7
	Item 17 Voting Client Securities	7
	Item 18 Financial Information	7

ITEM 4

Advisory Business

DAC Asset Management was founded in 2005 by Lawrence J. Daly with the objective of providing personalized and innovative investment advice to high net worth individuals and their families. DAC offers investment advisory services utilizing a “Manager of Managers” platform. The role of the firm is to provide a professional, coordinated approach to assist clients with broad issues of portfolio management. On an independent basis, the firm acts as a coordinator and advisor of client investment portfolios and portfolio strategies. It is necessary, however that clients understand that any investment in securities exposes them to a potential loss of principal. In this role, the following are the core services of DAC. To review, revise, and /or develop investment objectives in conjunction with the client; develop asset allocation strategies, research, evaluate and suggest top performing investment managers to compliment allocation objectives and monitor portfolio performance. Primary goal is to identify a pool of investment managers that I believe provide the clients with good risk adjusted returns in varying market conditions. These diverse investment manager’s options enable the clients to create tailored investment strategies providing attractive risk-adjusted returns, with particular emphasis on absolute return oriented opportunities. Some characteristics of the investment management firms; clearly articulated investment strategy, solid infrastructure and business plan. Attractive long term returns with relatively low volatility, disciplined investment process that is repeatable in different market environments, and the investment of significant capital, ensuring alignment of investor and manager interest.

Prior to founding DAC Asset Management LLC, Lawrence J. Daly who has over 30 years of experience in the investment field, has worked in the past at Salomon Brothers, portfolio manager at Putnam Management and John Hancock Mutual Funds, Inc. Lawrence J. Daly graduated from Gannon University.

As of August 1, 2015 DAC Asset Management managed asset of 129 million on a non-discretionary basis and 115,000 thousand on a discretionary basis. DAC does not have custody of any client funds. Discretionary funds reported pertain to DAC operating funds. DAC has minimum investment portfolios of \$3,000,000, in certain circumstances; DAC will consider portfolios below this benchmark on a case-by –case basis. DAC is closed to new investors.

ITEM 5. Fees and Compensation

DAC charges fees on a quarterly basis. All fees are invoiced and are not deducted from client accounts. Compensation arrangements may vary among clients .Fees are negotiated through discussion and mutual agreement. In all case, the agreed upon fee structure is in proportion to the assets under management and the client’s portfolio monitoring and reporting needs. Fees are typically paid in arrears with the compensation arrangements fully disclosed in the client’s

investment advisory contract. While highly unlikely, if fees were to be paid in advance it would never be in excess of 3 months; if the client should terminate the relationship, unearned fees would be refunded on a pro-rata basis.

Some clients have a fixed annual fee arrangement with fees paid on a quarterly basis; the fixed fee is initially negotiated and subsequently renegotiated prior to the annual anniversary date. Other clients have a standard fee schedule of 0.50% based on quarterly AUM (50 basis points) per annum of asset under management. Assets under management at the time the fixed annual fee is established is the basis for determining the amount of the annual fee. In general, we base all fees on assets under management. For new or terminating clients we calculate fees on a pro-rata basis.

ITEM 6. Performance Based Fees and Side-By-Side Management

DAC does not receive performance based fees nor do we participate in Side-by-Side Management. DAC receives no compensation from the investment managers who are managing the clients assets.

ITEM 7. Types of Clients

High net worth individuals.

ITEM 8. Methods of Analysis, Investment Strategies and Risk of Loss

DAC utilizes a “Manager of Managers” platform. Our analysis ,due diligence review and recommendations are based on a variety of techniques ,sources and review assessments including; assessment of client risk tolerance ,direct meetings/conversations with managers, review of managers investment and risk management controls , review and analysis of past performance ,research materials provided by independent third party sources, conversations with manager references and SEC filing information. Direct and ongoing analysis of manager portfolio activity as provided by manager, custodian, and /or designated agent. Feedback from industry contacts/sources. Regular contact with key personal in organizations. It is necessary, however that clients understand that any investment in securities exposes them to potential loss of principal. Please review **ITEM4** for additional information.

ITEM 9. Disciplinary Information

Neither DAC nor Lawrence J. Daly has been the subject of any material legal or disciplinary action.

ITEM 10. Other Financial Industry Activities and Affiliations

DAC has no other Financial Activities and/or Affiliations.

ITEM 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

DAC from time to time may recommend investment managers, closed –end funds, mutual funds and exchange traded funds to clients that the company and/or employee(s) also invest in or own. The company has currently one owner/employee. The risk to clients should the owner /employee invest in those areas recommended to that client is minimal as the owner/employee is not able to influence price nor control market timing issues as all trading is occurring thru third party providers. Additionally, all managers and or funds the client invests in, upon recommendation by DAC require the client to establish accounts/relationships in their client name. DAC does not have custody or discretionary authority over direct client accounts held in the client's name. The owner /employee maintains a personal account at Fidelity Investments and all personal transactions are placed thru that account. Rule 204A-1(d) provides an exception to small advisers with only one access person from submitting reports or obtaining approval for investments.

ITEM 12. Brokerage Practices

DAC does not have custody of client assets nor discretionary authority on any client accounts. DAC does not suggest brokers to any clients.

ITEM 13. Review of Accounts

Client portfolios are reviewed on an on-going basis by the firm with respect to client needs, current events and market developments. Each account is reviewed at least quarterly by Lawrence J. Daly. Clients can waive the reporting requirement. Following is list of those activities; review and evaluate portfolio holdings, develop asset allocation strategies, perform due diligence, research, evaluate and select investment managers to compliment the allocation objectives ,coordinate investment activity by working directly with the client and /or a designated agent. Review and communicate portfolio performance on an ongoing basis and provide ongoing advice and assessment of asset allocation and investment manager selection decisions. The investment firms are responsible for the custody and client statements which are noted in their contracts. All correspondence from the managers and the custodians goes directly to the clients and DAC, (monthly statements and reports, quarterly updates on performance, holdings and a review of the portfolio). If any client has mutual fund holdings they are available to review on a daily basis. DAC maintains frequent contact with clients to provide ongoing advice on asset allocation.

ITEM 14. Client Referrals and Other Compensation

DAC does not accept any type of compensation monetary or otherwise for client referrals to the firm. As a matter of policy the DAC does not accept any monetary, research products or services in connection with the allocation of our client's portfolio business.

ITEM 15. Custody

DAC does not have custody of any client funds. Discretionary funds reported on ADV Form 1 pertain to DAC operating funds. All separately managed client accounts are maintained in the name of the client and DAC does not have custody over these assets.

ITEM 16. Investment Discretion

All trading and discretionary authority is with the client and/or their designated representative(s). Under no circumstances will DAC have discretionary authority with respect to client accounts that are separately managed.

ITEM 17. Voting Client Securities

As a matter of policy, DAC will not vote client proxy statements. On a practical level, the investment advisory services of DAC, based on a Manager of Manager platform, will never result in DAC having the option to vote client proxy statements. All client accounts are in client name and DAC is never the address of record for account mailing information. DAC is an interested third party for purposes of receiving duplicate information on client accounts. Typically the opportunity to exercise control over proxy voting resides with either the client or with the investment manager.

ITEM 18. Financial Information

DAC does not require or solicit the prepayment of any advisory fees from its clients. The firm does not have custody of any client's funds and the firm does not have discretionary authority with respect to client accounts that are separately managed. DAC knows of no financial impediments that are reasonably likely to occur to impair its ability to meet its commitments to its clients.

