



**Naples Asset Management Company<sup>®</sup>, LLC**  
Registered Investment Advisor

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## **FIRM BROCHURE**

**Effective July 1, 2016**

**Naples Asset Management Company<sup>®</sup>, LLC**  
**1100 Fifth Avenue South, Suite 201**  
**Naples, Florida 34102**

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This Brochure provides information about the qualifications and business practices of Naples Asset Management Company<sup>®</sup>, 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<sup>®</sup>, 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<sup>®</sup>, 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<sup>®</sup>, LLC is 133978.

**Naples Asset Management Company<sup>®</sup>, LLC**  
**Form ADV Part 2A**  
**Firm Brochure**

**IARD/CRD No. 133978**  
**SEC File No.: 801-66945**

## Item 2 Material Changes

The last annual update of this brochure was in February 2016. Since that time, NAMCO has created a Wrap Fee Program and with this filing update, we are also making the initial filing of the **Wrap Fee Program Brochure** (Form ADV Part 2A, Appendix 1).

We have also adding language to this Firm Brochure (Form ADV Part 2A) to allow an Investment Advisory Representative ("**IAR**") to conduct his/her investment advisory activities under a separate business name or "**DBA**" ("doing business as"). Such advisors, while registered with NAMCO as IARs, are independent contractors. NAMCO supervises the IARs' investment advisory activities.

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## Advisory Business

(Form ADV Part 2A, Item 4)

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

Naples Asset Management Company®, LLC (“**NAMCO**”) is a registered investment adviser (“RIA”) based in Naples, Florida and is registered to conduct business in states it is registered, or qualifies for an exemption or exclusion from registration requirements. 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.

NAMCO provides investment advisory services through supervised financial professionals who are investment advisory representatives (“**IARs**”) of the firm. The majority of IARs conduct their investment advisory activities under NAMCO. However, an IAR is allowed to conduct his/her investment advisory activities under a separate business name or “**DBA**” (“doing business as”). Such advisors, while registered with NAMCO as IARs, are independent contractors. NAMCO supervises the IARs’ investment advisory activities. Investment advisory agreements (“**IAAs**”) and marketing materials clearly disclose NAMCO as the RIA with whom clients are engaging for investment advisory services. Currently, we offer the following investment advisory services:

- **Portfolio Management Services**
- **Retirement Plan Services**
- **Investor Education**
- **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, 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 process in an 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.

Investment objectives may range from conservative income to aggressive growth, 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 may 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. Please note: **NAMCO does not have custody over client funds.**

### **Wrap Fee Program**

NAMCO sponsors the Advisor Managed Wrap Fee Program (the "Program") and offers the services of the Program to both its existing and prospective clients. Under a wrap fee program, the wrap fee program sponsor arranges for the client to receive investment advisory services, the execution of securities brokerage transactions, custody and reporting services for a single specified fee.

Participation in a wrap fee program may cost the clients more or less than purchasing such services separately. Clients who are recommended the services of the Program by Advisor should receive a copy of Appendix 1 of Advisor's Form ADV, Part 2A for the Program (the "Wrap Fee Program Brochure") in addition to this Disclosure Brochure, which contains important information about the Program that should be read carefully. If you did not receive a copy of the Wrap Fee Program Brochure, please contact us at (239) 593-5525.

In addition to sponsoring the Program, Advisor also makes available some of its portfolio management services to the Program's wrap fee clients. There are no material differences in how Advisor manages the accounts of the Program's wrap fee clients and Advisor's other non-wrap fee clients. As compensation for its provision of portfolio management services to clients of the Program, Advisor receives a portion of the Program's wrap fee.

### **Types of Investment**

Depending on the needs of the clients, NAMCO may recommend or provide consulting services on listed securities, exchange traded funds, mutual funds, corporate bonds, U.S. Government securities, tax-exempt municipal bonds, real estate 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, registered investment advisors and trust programs.

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

### **Third Party Managed Account Solutions**

In addition to offering services directly to investment advisory clients, the Advisor also provides investment management services through and sponsored by independent, third party investment firms, other registered investment advisory firms, and investment management consultants (collectively, "**Third Party Advisors**" or "**Platform Managers**").

NAMCO has entered into agreements with Envestnet Asset Management, Inc., SEI Private Trust Company, ePlan, Betterment Securities, and Covestor Limited, or/and other such firms, be it a Third Party Advisor or Platform Manager, relating to the investment advisory and/or performance measurement services that may be provided to a Client by Advisor, Third Party Advisor or a Platform Manager. Advisor may determine

that Client may be a suitable participant and may recommend to Client that Client participate in a Managed Account Solutions Program (the “**Program**”) offered by Platform Manager.

Third Party Advisors and Platform Managers are responsible for managing brokerage accounts for their customers. Programs offered by Third Party Advisors or Platform Managers do not constitute personalized investment advice by the Advisor, and an investor should know that the Advisor does not take any investor’s personal financial needs into consideration nor does he customize offerings based on the needs of any individual investor through Third Party Advisors or Platform Managers.

Given the structure of these investment platforms, the Advisor does not act in a fiduciary capacity to the end-clients. The Advisor makes reasonable attempts to ensure that Third Party Advisors and Program Managers with whom the Advisor has contractual agreements are properly licensed or exempt from registration.

Client understands that a Third Party Advisor or Platform Manager and Advisor are not affiliated other than through jointly providing services to the Program. A Platform Manager, a registered investment adviser, operates the technology platform on which the Program functions and renders investment advice to Advisor and/or Client, including recommending an appropriate asset allocation for Client and specific investment managers or investment products. Aspects outlining services, costs and management options are disclosed in the appropriate Third Party Advisor’s or Platform Manager’s Firm Brochure (Form ADV Part 2), other disclosure brochures/documents, investment advisory contracts, and account opening documents. Each investor will be required to sign an advisory agreement directly with the Third Party Advisor selected.

In addition to a Platform Manager’s advisory services offered in their Program, other advisory service tools may be provided, including administrative and technology services. A Client’s Advisor determines which services and Programs to utilize with its Clients and may utilize the services of other third-party services providers in conjunction with the Programs that a Client may discuss with their Advisor for a description of that Advisor’s specific use of a Program.

**The services offered by a Platform Manager or Third Party Advisor may include:**

- Assessment assistance of the Client’s investment needs and objectives
- Investment policy planning assistance
- Assistance in development of an asset allocation strategy designed to meet the Client’s objectives
- Recommendations on suitable style allocations
- Identification of appropriate managers and investment vehicles suitable to the Client’s goals
- Evaluation of asset managers and investment vehicles meeting style and allocation criteria
- Engagement of selected asset managers and investment vehicles on behalf of the Client
- Ongoing monitoring of individual asset manager’s performance and management for “Approved” investment strategies
- Review of Client accounts to ensure adherence to policy guidelines and asset allocation
- Recommendations for account rebalancing, if necessary
- Online reporting of Client account’s performance and progress

For all Programs, Client and Advisor may compile pertinent financial and demographic information to develop an investment program that will meet the Client’s goals and objectives. Utilizing the Platform Manager’s tools, Advisor will allocate the Client’s assets among the different options in the Program and determine the suitability of the asset allocation and investment options for each Client, based on the Client’s needs and objectives, investment time horizon, risk tolerance and any other pertinent factors. The

Platform Manager's research team uses a number of proprietary analytical tools and commercially available optimization software applications in developing its asset allocation strategies.

Among the factors considered in designing these strategies are historical rates of risk and return for various asset classes, correlation across asset classes and risk premiums. For all Programs, the Client directly owns the underlying securities, mutual funds or Exchange Traded Funds ("ETFs") in each of the Program's investment strategies. Mutual funds, ETFs, closed-end funds, unit investment trusts, real estate investment trusts, and exchange traded funds are collectively referred to throughout this document generally as a "Fund" or "Funds."

### **Assets Under Management**

As of December 31, 2015, NAMCO manages **\$104,815,152** of investment assets. **\$43,299,905** are managed on a discretionary basis and **\$61,515,247** on a non-discretionary basis.

## **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

### **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

## Investor Education

NAMCO recognizes that education and awareness are powerful tools in decision making, enhancing investment returns, decreasing portfolio risk and in the fight against investment fraud. NAMCO offers a variety of investor education programs that can be customized for Employees, 401k Plan participants and other organizations. Please contact us for more information on designing a program to fit your needs.

## 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, document 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 o

### Types of Consulting Services

- **Asset Management Consulting Services.** NAMCO may provide consulting services to registered investment advisors; FINRA members, Mutual Fund Sponsors, Fund Issuers and Bank Trust Departments on third party "turnkey" asset management platforms and investment managers.
- **Administrative Services.** NAMCO may also charge the issuer of a security an initial and or ongoing administrative fee for consulting, accounting and administrative services. NAMCO may provide initial and ongoing consulting to business owners or issuers of private investment offerings.
- Representatives of NAMCO, when properly licensed in their state, may offer various levels of insurance consulting services and product solutions to clients. This may involve the recommendation of one or more life insurance and annuity products offered through an insurance company that specializes in insurance products. The types of consulting services on insurance product needs may range from immediate annuities, to survivorship life insurance products that may include term life, whole life, universal life, variable universal life, long-term care solutions and structured settlements. Insurance product sales are outside the scope of normal portfolio services offered by the Company.

Products are selected and recommended by an adviser, on criteria important to the client, including the financial strength of the insurance company, premium cost, declared rates of interest, income and/or annuity purchase rates.



## **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 in 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. NAMCO's fees are negotiable, usually a fee of 1.50% per annum will be charged for assets of up to \$1 million, 1.25% for assets up to \$5 million and 1.00% for assets over \$5 million.

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). For accounts it manages, 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.

NAMCO may recommend to high net investors certain outside money manager that may charge "Performance-Based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client), however in those instances, different client suitability standards are applied and additional disclosure documents must be provided to a potential client before any services may be rendered.

## Types of Clients

(Form ADV Part 2A, Item 7)

### **Item 7 — Types of Clients**

NAMCO's clients are individual investors, retirement plans, broker dealers, investment advisers, institutional clients, insurance companies, endowment funds, family offices, business owners and other institutional entities. We offer investment advisory services to individuals and institutions. In general, we require a minimum account size of \$100,000. 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.

## Methods of Analysis, Investment Strategies and Risk of Loss

(Form ADV Part 2A, Item 8)

### **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 Methods of Analysis, Investment Strategies and Risk of Loss**

(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 and Chief Compliance officer 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.

## Code of Ethics

(Form ADV Part 2A, Item 11)

### **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**

NAMCO does not maintain custody of your assets, on which we advise, as these must be maintained in an account with what is considered a “qualified custodian,” generally a broker-dealer or bank. NAMCO recommends that our clients use Fidelity Investments, SEI, Betterment Securities, or another similarly registered broker-dealer, as the qualified custodian. NAMCO is independently owned and operated and is not affiliated with any broker-dealer at the firm level, however its Compliance Officer also provides compliance services to MSC-BD, LLC a FINRA member broker dealer.

A Broker Dealer will hold your assets in an account and can buy and sell securities when we and/or you instruct them to. While we recommend that you use the above mentioned custodian/brokers, you will decide whether to do so, and with whom. We do not open the account for you, although we may assist you in doing so.

#### **HOW WE SELECT BROKERS/CUSTODIANS**

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are, overall, most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Capability to execute, clear, and settle trades (buy and sell securities for your account) itself or to facilitate such services.
- Capability to facilitate timely transfers and payments to and from accounts.
- Availability of investment research and tools that assist us in making investment decisions.
- Quality of services.
- Competitiveness of the price of those services and willingness to negotiate the prices.
- Reputation, financial strength, and stability.
- Prior service to us and our other clients.

#### **YOUR BROKERAGE AND CUSTODY COSTS**

For our clients’ accounts that a Platform Manager maintains, the Broker Dealer generally does not charge separately for custody services, but is compensated as part of the Platform Manager fee, which is a percentage of the dollar amount of assets in the account in lieu of commissions. We have determined that having a Platform Manager execute trades is consistent with our duty to seek “best execution” of an account trade. 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”).

Aspects outlining services, costs and management options are disclosed in the appropriate Platform Manager’s Firm Brochure” which will be provided if the Advisor and Client agree to participate in those services.

#### **SERVICES AVAILABLE TO NAMCO VIA A PLATFORM MANAGER**

Management Platforms, as described, are designed to be of institutional quality, provide both investment and advice designed to serve independent investment advisory firms like NAMCO. These management platforms usually make available various support services which may not be available to regular retail

customers. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Some of these support services may include:

- a. Assist with back-office functions, recordkeeping, and client reporting of our clients' accounts.
- b. Provide access to client account data (such as duplicate trade confirmations and account statements).
- c. Provide pricing and other market data.
- d. Assist with back-office functions, recordkeeping, and client reporting.
- e. Educational conferences and events.
- f. Consulting on technology, compliance, legal, and business needs.
- g. Publications and conferences on practice management and business succession.

## **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, or where their consolidated accounts of assets are held. Some custodians including Fidelity Investments, if they deem an account has not had "activity" for a particular month, no statement for that month will be sent.

## **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 Securities and Exchange Commission. The Chairman and CEO 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.

NAMCO may only transact business in those states in which it is registered, or qualifies for an exemption or exclusion from registration requirements.

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.





**Naples Asset Management Company<sup>®</sup>, LLC**  
Registered Investment Advisor

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**FORM ADV PART 2B – BROCHURE SUPPLEMENT**

**JUNE 2016**

**Naples Asset Management Company<sup>®</sup>, LLC**  
**1100 Fifth Avenue South, Suite 201**  
**Naples, Florida 34102**

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

**Telephone:** 239.593.5525

**Facsimile:** 239.593.9731

*This Brochure Supplement provides information about:*

- |                        |                     |                         |
|------------------------|---------------------|-------------------------|
| • Thomas J. Cooper     | • Brent McGibbon    | • Victoria L. Ragland   |
| • Al DiNicola          | • Paul J. McIntyre  | • Torr Steinhilber      |
| • Walter M. Hester III | • John M. Ruff      | • Richard M. Patrick IV |
| • Eric J. Linser       | • Bryan E. Smith    | • Adam V. Waszkowski    |
| • Christopher R. Lundy | • Thomas B. Sanchez | • Kevin L. Zylstra      |

*This information supplements the Naples Asset Management Company<sup>®</sup> LLC's, ("NAMCO") Brochure. You should have received a copy of that Brochure. Please contact us at the telephone number printed on this cover page if you did not receive NAMCO'S Brochure or if you have any questions about the contents of this Brochure Supplement.*

*Additional information about the named supervised persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**Examinations and Professional Designations**

- FINRA: Series 7 (General Securities)
- Series 66 (Securities Agent/Investment Adviser Representative)
- Series 24 (General Securities Principal)
- NASAA: Series 65 (Investment Adviser Law)
- Series 63 (Blue Sky Law)
- Florida Life Variable Annuity and Health License
- CMS Medicare Certification with AARP/ United Health Care for 2015 and 2016

**Post-Secondary Education**

- College for Financial Planning, CFP Certificated 1983
- Life Underwriter Training Courses Level I and II. Completed 1995
- LUTC Instructor: Financial Principles & Planning. 1995 - 2000

**Business**

- **Naples Asset Management Company, LLC:** Naples, Florida, Certified Financial Planner. 2013-present
- **Global Wealth Consultants, LLC:** Certified Financial Planner and Business Development Officer 2011-2013
- **Commonwealth Financial Network:** Certified Financial Planner and Investment Advisor. Managed client investment accounts in 16 states. 1996 - 2010
- **INVESTACORP, INC:** Certified Financial Planner and managed diverse investment securities and supervised ten branch offices of the firm. 1983 - 1995
- **EF Hutton Life Insurance Company:** Managing General Agent. Marketed strategic life insurance and annuity products. Supervised over 100 producing agents in a three state area and facilitated key insurance policies for estate and business planning. 1983 - 1993
- **Financial Alternatives, Inc.:** Certified Financial Planner and Investment Advisor. Provided retirement, estate, business, cash flow and other types of consulting services 1981 - 2009

**Associations**

- Trustee, Greater Naples Firefighters Pension Plan, Naples, FL 2015 to present.
- FINRA Financial Services Institute (FSI) 1995-2010
- Florida Life and Health Insurance 1980 to present
- Past NALU Chapter President 1994
- Presidents Council of Commonwealth Financial Network 1987-2008
- Gulf Coast Sailing Club 2009 - present
- US Sailing Certified Instructor 2009 – present

**DIRECTOR REAL PROPERTY CONSULTING SERVICES**

**Born: 1949**

**Examinations and Professional Designations**

- FINRA Series 22 Direct Participation Limited Representative
- NASAA Series 66 Uniform Combined State Law
- NASAA: Series 65 (Investment Adviser Law)
- Florida Real Estate Broker
- National Association of Realtors - Certified Residential Broker (CRB)

**Post-Secondary Education**

- College of New Jersey – Bachelor of Science 1971
- College of New Jersey – Masters in Administration 1975
- National Association of Home Builders- Institute of Residential Marketing (MIRM) 1995

**Business**

- **Naples Asset Management Company, LLC**, Naples, Florida, 2006 to Present.
- **Miromar Lakes Beach & Golf Club**, Miromar, Florida. Vice President of Sales 2012 to Present
- **MSC-BD, LLC**, Lake Oswego, Oregon, Investment Banker 2006-2009
- **Pinnacle Performance Investments, LLC**, Naples, Florida, Real Estate Management and Consulting Services 2008-2014
- **Crown Capital Investment Properties, LLC**, Bank REO workout Specialist 2005- 2010
- **Pelican I Real Estate & Development Inc.**, Naples, Florida, Real Estate Management and Consulting Services 2005-2012
- **St. James Development, LLC**, Naples, Florida, Real Estate and Development 2003-2014
- **Bonita Bay Group, Inc.** Bonita Spring, FL Broker & Director of Sales, Product Development and new product launch. 1995-2005
- **Westinghouse Communities**: Naples, FL Vice President Sales Real Estate Developments in Lee and Collier County 1990- 1995
- **The Byrne Corporation**: Project Manager various locations Hilton Head SC; Sarasota, FL; Cape Cod, MA; Vero Beach, FL Real Estate and Development of highly amenitized communities. Jan 1980- Oct 1990

**Associations**

- National Association of Realtors (NAR) 1995-2014
- National Association of Rhome Builders (NAHB) 1990- 2014
- Florida Association of Realtors (FAR) 1995-2014
- Florida Association of Realtors- Chairman Professional Standards Committee 2004
- Florida Association of Home Builders 1990-2014
- Naples Chamber of Commerce 2012-2014
- Lee Building Industry Association 1995-2014
- Collier Building Association 1995-2014
- Past Member Florida Bankers Association 2011-2012

## **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:** Naples, Florida. 2009 - Present
- **MSC-BD, LLC:** Naples, Florida, Registered Representative. FINRA Broker Dealer. 2010 - 2012
- **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

## **ERIC J. LINSEY, CFA**

### **INVESTMENT ADVISOR REPRESENTATIVE**

**Born: 1968**

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

- FINRA Series 65 (Securities Agent/Investment Adviser Representative) 2009 - Present
- FINRA Series 7 (General Securities) 1999 – 2005
- FINRA Series 66 (Uniform Combined State Law) 1999 – 2005

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

- Bachelor of Business Administration (BBA) in Finance. Kent State University. 1986 - 1990
- Chartered Financial Analyst (CFA) charter holder. 1994

#### **Business**

- **Green Valley Wealth Advisors, LLC:** San Francisco, California. Investment Advisor Representative. Rebranded the firm name as an affiliate of Naples Asset Management. \* Looking to provide personalized and solid wealth management solutions to individuals, families, businesses and charities. Serving clients as a fiduciary to educate and provide insightful advice and guidance on clients' financial needs. \*Investment advisory services offered through Naples Asset Management Company, LLC, a federally registered investment advisor (CRD 133978). 2016 – Present
- **WealthSource Partners, LLC (formerly Avant-Garde Advisors LLC):** San Francisco, California. Investment Advisor Representative. Offered proactive and insightful investment management and wealth planning advice and guidance to individuals, their families and their businesses. 2012 – 2016

- **Green Valley Wealth Advisors, LLC:** San Francisco, California. Chief Investment Officer & Managing Member. Provided tailored wealth management services to meet the unique needs of high net worth individuals and their families. 2009 – 2013
- **Wells Fargo Private Bank:** Walnut Creek and Palo Alto, California. Senior Portfolio Manager & Vice President. Managed and serviced large and complex fiduciary relationships, fully accountable for all legal and investment management aspects. 2000 – 2009.
- **Merrill Lynch:** San Francisco, California. Personal Investment Advisor. Managed investment portfolios and provided exit strategies to corporate executives with concentrated stock (and option) positions acquired through corporate benefits programs. 1999 – 2000
- **RSS Investment Counsel:** San Francisco, California. Chief Investment Officer. Actively managed investment portfolios for high net worth individuals and their families, and supervised research and trading staff. 1996 – 1999
- **The InterGroup Corporation:** Los Angeles, California. Investment Advisor. Oversaw sourcing and allocating of corporate investment funds, particularly to start-up entities within high technology and manufacturing sectors. 1995 – 1996
- **Lipman, Carasso & Young:** Los Angeles, California. Investment Analyst. Conducted fundamental and quantitative investment research and overall portfolio analysis. 1993 – 1995
- **William Mason & Company:** Los Angeles, California. Investment Analyst. Provided fundamental and quantitative investment research, and fostered wrap programs with regional brokerage firms. 1991 – 1993

#### **Associations, Outside Interests**

- CFA Institute and CFA Society of San Francisco
- Cycling enthusiast
- Committed volunteer in children's activities and community service

### **CHRISTOPHER R. LUNDY**

#### **PORTFOLIO MANAGER**

**Born: 1984**

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

- FINRA Series 7 (General Securities)
- Series 66 (Securities Agent/Investment Adviser Representative)
- Series 63 (Blue Sky Law)
- NASAA: Series 65 (Investment Adviser Law)
- New Jersey Life & Annuity Insurance License

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

- William Paterson University, Teaching Certification. 2010
- Ramapo College of NJ, Bachelor of Arts, Political Science. 2007

#### **Business**

- Naples Asset Management Company: Naples, FL, Senior Portfolio Manager. 2014 to present.
- J.P. Morgan Chase: Brooklyn, NY, Research Analyst – Mortgages 2011-2012
- T3 Live: Equity Trader, New York, NY. 2011

- U.S. Census Bureau: Supervisor, Hoboken, NJ 2010
- E\*TRADE Financial: Senior Broker, Jersey City, NJ, 2007-2008

#### **Associations**

- Hudson County University Club 2007 – Present

### **BRENT E. MCGIBBON, MBA**

#### **Investment Advisor Representative**

**Born: 1967**

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

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

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

- University of Arizona 1985-1990, Bachelor of Fine Arts, Media Arts
- University of Phoenix 1997-1999, Masters in Business Administration (MBA)

#### **Business**

- Naples Asset Management Company: Naples, FL, Investment Advisor 2016 to present.
- McGibbon Asset Management, LLC. 1999 – Present
- WealthSource Partners, LLC 2015-2015
- Dean Witter Securities 1993 -1993
- Charles Schwab 1993 -1995

#### **Associations**

- **Habitat for Humanity:** Volunteer

### **PAUL J. MCINTYRE, CRC®, CRA®, PPC™, AIF®**

#### **CHIEF EXECUTIVE OFFICER and COMPLIANCE OFFICER**

**Born: 1951**

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

- Center for Fiduciary Studies: Accredited Investment Fiduciary designee (AIF®)
- Center for Fiduciary Studies: Professional Plan Consultant designee (PPC™)
- 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**

- Center for Fiduciary Studies: Professional Plan Consultant designee (PPC™) 2016
- Center for Fiduciary Studies: Accredited Investment Fiduciary designee (AIF®) 2015

- International Foundation for Retirement Education (InFRE). Certified Retirement Counselor Certification (CRC®). 2003
- International Foundation for Retirement Education (InFRE). Certified Retirement Administrator Certification (CRA®). 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. Commercial Insurance Licensing & Training Certification. 1978
- Eastern Michigan University, Ypsilanti, Michigan B.S. Business Education. 1978

### Business

- **Naples Asset Management Company®, LLC:** Naples, Florida. Chief Executive Officer & Chief Compliance Officer. Provides arbitration, expert witness and other consulting services on securities matters. Registered Investment Adviser: 2005 – Present
- **NAMCO Benefits, LLC:** Naples, Florida. Continuing Education. Provides Continuing Education courses for Florida CPAs and Life, Health and Variable licensed insurance agents and Insurance Services for licensed insurance agents. 2014-Present.
- **MSC-BD, LLC:** Lake Oswego, Oregon, Chief Operating Officer and Chief Compliance Officer. FINRA Broker Dealer, Member of SIPC: 2006 – Present
- **FINRA Dispute Resolution:** Arbitrator and Chairperson for financial industry client and firm dispute matters. 2002 – Present.
- **Continuing Education Provider:** CPA's, Attorney's and Insurance Agents 1985 – 2014. **Registered Principal/Representative:** for FINRA member broker/dealer firms 1979 – 2002

### Associations

- **Habitat for Humanity:** Volunteer

## RICHARD MONTGOMERY PATRICK IV

### INVESTMENT ADVISER

**Born: 1961**

### Examinations and Professional Designations

- FINRA: Series 7 (General Securities)
- Futures Managed Funds Examination
- Series 66 (Securities Agent/Investment Adviser Representative)

### Post-Secondary Education

- Ohio Wesleyan University 1980-1981. **Course of Study:** History, Math and Economic.
- University of Massachusetts Amherst 1981-1985. **Course of Study:** Economics
- University of Manchester (United Kingdom) 1985. **Course of Study:** Economics
- City College of San Francisco, 1986. **Course of Study:** History
- University of Washington 1998. **Course of Study:** Economics
- University of Massachusetts Amherst 1998. **Bachelor of Art Degree:** Economics

## **Business**

- **Naples Asset Management Company, LLC**, Investment Adviser 2016-Present
- **Avant-Guard Advisors, LLC**, Investment Adviser 2012-2016
- **Charles Schwab & Company, Inc.** Financial Advisor, FINRA Member broker Dealer 2004-2011
- **Wunderlich Securities, Inc.** Financial Advisor 2011-2012
- **IMFG Securities, Inc.** Financial Advisor 2004-2012
- **Morgan Stanley**: Financial Advisor 2002-2004
- **Insurance Consultant**: Agent representing insurance carriers to address personal and business insurance client needs 1984-2002

## **Associations**

- **Habitat for Humanity**: Volunteer
- **Monument Crisis Center**: Volunteer
- **Alameda Food Bank**: Volunteer
- **NORCAL USTA Men's Tennis Teams**: Captain
- **Youth Soccer, Tennis and Baseball**: Coach

**VICTORIA L. RAGLAND, CFP®**

**INVESTMENT ADVISER AND CERTIFIED FINANCIAL PLANNER**

**Born 1954**

## **Examinations and Professional Designations**

- FINRA: Series 7 (General Securities)
- Series 66 (Securities Agent/Investment Adviser Representative)
- FINRA Series 24 (General Securities Principal)
- Series 63 (Blue Sky Law)
- Missouri Life Variable Annuity and Health License

## **Post-Secondary Education**

- College for Financial Planning, CFP Certificated 1992
- St. Louis University, graduated with honors

## **Business**

- **Naples Asset Management Company, LLC**, Investment Adviser 2016-Present.
- **Equity Management Inc.** President, FINRA Member broker Dealer 1992-2016
- **Equity Investment Services, Inc.** President, Registered Investment Advisor 1996-2016
- **Registered Representative**: For various Broker Dealer firms. 1982-1996.

## **Associations**

- **BPW Business and Professional Women's Organization** 2007 – Present



## **JOHN M. RUFF**

### **SENIOR PORTFOLIO MANAGER**

**Born: 1947**

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

- FINRA: Series 7 (General Securities)
- NASSA: Series 66 (Securities Agent/Investment Adviser Representative)

#### **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:** Naples, 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

## **THOMAS B. SANCHEZ, MBA**

### **RETIREMENT PLAN CONSULTANT**

**Born: 1969**

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

- FINRA: Series 7 (General Securities)
- Series 24 (General Securities Principal)
- Series 63 (Blue Sky Law)
- NASAA: Series 65 (Investment Adviser Law)
- Texas Life Variable Annuity and Health License

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

- Merrill Lynch Pierce Fenner & Smith, NY, NY. Donald T. Regan Certification Program, Certified Financial Manager Program (CFM).
- University of Houston-Clear Lake; Master's in Business Administration
- University of Houston-Main Campus; B.S. Economics

#### **Business**

- **Naples Asset Management Company®, LLC:** Houston, Texas, Retirement Plan Consultant, Registered Investment Adviser: 2006 – Present
- **MSC-BD, LLC:** Houston, Texas, Financial Consultant, FINRA Broker Dealer, Member of SIPC: 2006 - 2013
- **LPL Financial, LLC:** Houston, Texas, Branch Manager. FINRA Broker Dealer, Member of SIPC: 2003 – 2006
- **UBS Financial Services, Inc.:** Houston, Texas: Account Vice-President. FINRA Broker Dealer, Member of SIPC: 1998 - 2003

- **Merrill Lynch Pierce Fenner & Smith, Inc.:** Houston, Texas: Account Executive. FINRA Broker Dealer, Member of SIPC: 1994 - 1998

#### **BRYAN E. SMITH, CRPS®, AIF®**

##### **DIRECTOR OF ASSET MANAGEMENT and DIRECTOR OF RETIREMENT SERVICES**

**Born: 1969**

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

- FINRA Series 7 (General Securities Representative)
- NASAA Series 66 (Securities Agent/Investment Adviser Representative)
- College for Financial Planning: Chartered Retirement Plan Specialist designee (CRPS®)
- Center for Fiduciary Studies: Accredited Investment Fiduciary designee (AIF®)
- Florida Life and Variable Annuity License

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

- Center for Fiduciary Studies: Accredited Investment Fiduciary designee (AIF®) 2015
- 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:** Director of Asset Management and Retirement Plan Services. From 2008 to Present.
- **MSC-BD, LLC:** Naples, Florida, Registered Representative. FINRA Broker Dealer Member of SIPC 2008 – 2012
- **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

#### **TORR E. STEINHILBER**

##### **REGIONAL COMPLIANCE MANAGER AND ADVISOR**

**Born: 1969**

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

- FINRA: Series 6 (Variable Contracts and Mutual Funds)
- NASAA: Series 65 (Investment Adviser Law)
- Series 63 (Blue Sky Law)

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

- College for Financial Planning, CFP Certificated 1983
- LUTC Instructor: Financial Principles & Planning. 1995 - 2000

##### **Business**

- Naples Asset Management Company, LLC: Naples, Florida, Investment Adviser. 2015 - Present
- Munro Asset Management LLC: Investment Adviser 2006 - Present

- MSC-BD, LLC Product Due Diligence and Distribution Manager 2011-2015
- Registered Representative: For FINRA member broker/dealer firms 1994 – 2012

#### **Associations**

- FINRA Financial Services Institute 1994-2015

### **ADAM V. WASZKOWSKI, CFA®**

#### **SENIOR PORTFOLIO MANAGER**

#### **CHARTERED FINANCIAL ANALYST (CFA)**

**Born: 1971**

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

- FINRA: Series 7 (General Securities)
- Series 66 (Securities Agent/Investment Adviser Representative)
- Series 63 (Blue Sky Law)
- Florida Life and Health License
- Chartered Financial Analyst (CFA)

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

- Florida Gulf Coast University, MBA (Finance) 2009
- Boston College, B.S. Finance 1993

#### **Business**

- **Naples Asset Management Company, LLC:** Naples, Florida, Portfolio Manager. 2013-present.
- **Hold Brothers Capital, LLC:** Equity Trader, 2011
- **Morgan Stanley Smith Barney:** Naples, Florida: Financial Advisor. 2008-2011

### **KEVIN L. ZYLSTRA, CFP®**

#### **CERTIFIED FINANCIAL PLANNER**

**Born: 1971**

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

- FINRA: Series 7 (General Securities)
- FINRA: Series 6 (Mutual Funds and Variable Contracts)
- Series 63 (Blue Sky Law)
- Florida Life Variable Annuity and Health License

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

- College for Financial Planning, CFP Certificated 2003

#### **Business**

- **Naples Asset Management Company, LLC:** Naples, Florida, Certified Financial Planner. 2015-present
- **Global Wealth Consultants, LLC:** Certified Financial Planner and Relationship Manager 2011-2013
- **Raymond James:** Naples, FL Investment/ Portfolio Specialist November 2013- January 2015
- **New England Financial:** Minnetonka, MN Financial Planner June 1998- December 2011
- **Waddell & Reed:** Edina, MN Financial Representative June 1994- June 1998

## Privacy Policy

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.

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

## Business Continuation Plan

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.

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 primary 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. The firm's Business Continuation Plan 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  
1100 Fifth Avenue South, Suite 201  
Naples, Florida 34102

Phone: 239.593.5525 Facsimile: 239.593.931 [www.NaplesAM.com](http://www.NaplesAM.com)



**Naples Asset Management Company<sup>®</sup>, LLC**  
Registered Investment Advisor

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## **Wrap Fee Program Brochure**

### **Appendix 1 of Form ADV, Part 2A**

**Effective July 1, 2016**

**Naples Asset Management Company<sup>®</sup>, LLC**  
**1100 Fifth Avenue South, Suite 201**  
**Naples, Florida 34102**

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

**Telephone: 239.593.5525**  
**Facsimile: 239.593.9731**

This Wrap Fee Program Brochure provides information about the qualifications and business practices of Naples Asset Management Company<sup>®</sup>, 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<sup>®</sup>, 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<sup>®</sup>, 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<sup>®</sup>, LLC is 133978.

**Naples Asset Management Company<sup>®</sup>, LLC**  
**Form ADV Part 2A, Appendix 1**

**IARD/CRD No. 133978**  
**SEC File No.: 801-66945**

## **Material Changes**

**(Form ADV Part 2A, Appendix 1 - Item 2)**

NAMCO has created a Wrap Fee Program. This is the initial filing of the WRAP FEE PROGRAM BROCHURE (Form ADV Part 2A, Appendix 1).

We have also added language to this WRAP FEE PROGRAM BROCHURE and FIRM BROCHURE to allow an Investment Advisory Representative ("IAR") to conduct his/her investment advisory activities under a separate business name or "DBA" ("doing business as"). Such advisors, while registered with NAMCO as IARs, are independent contractors. NAMCO supervises the IARs' investment advisory activities.

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**Wrap Fee Program Services**

A “wrap fee program” provides clients with at least two types of services, investment advisory and trade execution, for a single “wrap” fee. The wrap fee is paid to Naples Asset Management Company, LLC (“**NAMCO**”) and/or a “**DBA**” (“doing business as”) of NAMCO (collectively the “**Advisor**”). The Wrap Fee Program (the “**Program**”) covers participating clients of all fees and costs associated with portfolio management, trade execution, custody, and client reporting relating to Program assets. All portfolio management services for clients participating in the Program are provided by the Advisor.

**Wrap Fees**

Advisor's annual wrap fees are based on a percentage of the market value of the client's Program assets and generally range from a minimum of 1.00% to a maximum of 2.50%. All wrap fee arrangements, however, are negotiated individually with each client based on various objective and subjective factors. These factors include, but are not limited to, the amount of the assets placed under Advisor's management, the investment strategy that the client's Program assets are managed under, the level and scope of the overall investment advisory services to be rendered and the complexity of the engagement. The final fee schedule negotiated with each Program client will be delineated in the client's Investment Advisory Agreement (“**IAA**”) with Advisor.

Program clients should be aware that the wrap fees they pay may be more than the aggregate costs they would incur if they purchased each of the services provided by the Program separately. Additionally, the wrap fee is not based on the number of transactions effected in Program accounts and consequently, the likelihood that a client may pay higher investment advisory fees increases as the number of transactions effected in a client's Program account(s) decreases. Furthermore, while the Advisor does not charge Program clients higher fees based on the volume of trading in their Program account, the Advisor may have an incentive to limit trading in a client's Program account(s) because the execution costs that the Advisor incurs can be based on the aggregate number of trades executed in the accounts of Program clients. Program clients should also be aware that the Advisor has a conflict of interest when it recommends mutual funds that are available for purchase on a no-load and/or no-transaction fee basis over other comparable mutual funds that are subject to sales charges because Advisor may not incur any expenses relating to such transactions, which ultimately reduces Advisor's costs in operating the Program, and because such cost savings are not passed through to Program clients.

Program clients generally elect to have wrap fees deducted directly from their custodial account(s), but, in the alternative, may elect to be billed for such fees. The IAA and/or the custodial/clearing agreement will authorize the custodian to debit client accounts for the amount of Advisor's wrap fee and authorize the custodian to remit such fee to Advisor. In the limited event that Advisor bills the client directly for wrap fees, payment is due upon receipt of Advisor's invoice. Wrap fees are generally deducted or billed monthly in advance, based on the market value of the Program assets under Advisor's management on the last business day of the previous month, but may be billed quarterly in advance or monthly or quarterly in arrears in certain circumstances. Wrap fees are prorated for any new account opened during a calendar month or quarter based on a 360-day year/30-day month calendar. Advisor does not prorate its wrap fees with respect to cash flows except as part of a new account opening.



The IAA will continue in effect until terminated by either party by written notice in accordance with the terms of the IAA. In the event that a Program client terminates their IAA prior to the end of a month or quarter and is billed in advance, the client will receive a refund of any unearned wrap fees that were deducted from their custodial account(s). If the Program client was billed in arrears, the client will be responsible for paying pro-rated wrap fees for services rendered up to and through the date of termination. The amount of the refund is calculated by dividing the number of days left in the quarter after the date of termination by the total number of days in the quarter using a 360-day year/30-day month calendar and multiplying that amount against the wrap fee that was received by Advisor in advance for the month or quarter. The value of any amount owed is calculated by dividing the number of days in the month/quarter up to and including the date of termination by the total number of days in the month/quarter using a 360-day year/30-day month calendar and multiplying that amount against the market value of the Program assets on the date of termination.

#### **Other Fees and Expenses Clients May Pay**

In addition to the wrap fee discussed above, clients may also pay markups/markdowns on fixed income transactions as well as bank service fees; wire transfer and electronic fund transfer fees; interest on loans, debit balances and margin accounts; borrowing charges on securities sold short; odd-lot differential fees; transfer taxes; and other fees and taxes on brokerage accounts and securities transactions.

Mutual funds and exchange traded funds also charge internal management fees, which are paid to an unaffiliated third-party investment manager and disclosed in the fund's prospectus. Such charges and fees are exclusive of and in addition to Advisor's wrap fee. Consequently, Program clients will pay two levels of investment management fees, one to Advisor embedded in the wrap fee and one embedded within the net asset value of the mutual funds and exchange traded funds that Program clients are invested in.

#### **IAR Compensation**

Investment advisory representatives of Advisor ("IAR") who recommend the Program to Advisor's clients receive a portion of Advisor's wrap fees. The amount of compensation received by IARs for Program assets will vary and the amount of such compensation may be more than what they would receive if the Program client elected to pay separately for investment advice, brokerage, and other services. Consequently, IARs may have an incentive to recommend the Program to clients over other programs or services offered by Advisor.

Furthermore, because Advisor negotiates wrap fee arrangements individually with each Program client, Advisor's clients could pay diverse fees for the same services. Program clients should be aware that the wrap fee arrangements that Advisor negotiates with each client are not designed to result in the same level of net profitability for Advisor. Although Advisor believes that the wrap fee arrangements that it negotiates with each individual client are reflective of the value of the services that Advisor provides to such client, Program clients should be aware that the services provided by Advisor may be available from other investment advisers for a lower fee.

Program clients, consequently, are encouraged to review and assess the services that Advisor provides as well as the overall value of the Program and make their own independent determinations as to whether to enter into a wrap fee arrangement with Advisor.

## Account Requirements and Types of Clients

(Form ADV Part 2A, Appendix 1 - Item 5)

### Types of Clients

NAMCO's clients are individual investors, retirement plans, broker dealers, investment advisers, institutional clients, insurance companies, endowment funds, family offices, business owners and other institutional entities. We offer investment advisory services to individuals and institutions. In general, we require a minimum account size of \$400,000 to open a Program account. 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 the Program account if it falls below a minimum size, which, in our sole opinion, is too small to effectively manage.

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 Advisor, or at the discretion of Advisor. 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).

## Portfolio Manager Selection and Evaluation

(Form ADV Part 2A, Appendix 1 - Item 6)

### Portfolio Manager Selection

All Program accounts are managed by NAMCO and through the IAR assigned to the account. Advisor does not currently make available outside portfolio managers as part of the Program. It is Advisor's belief that both it and its IARs have sufficient financial background and experience to provide the types of portfolio management services offered by the Program. Program clients are encouraged to review the respective Form ADV, Part 2B(s) ("**Brochure Supplement**") for the IAR assigned to their Program account for information on their specific background and experience.

Advisor does not calculate composite performance returns for itself or its IARs, but does provide Program clients with monthly or quarterly brokerage statements relative to their account(s), which may show performance, or at least minimally monthly account value changes. The Advisor uses industry standards to measure its performance. Performance will be presented to clients in both annualized and cumulative terms, and clearly labeled as such.

Program clients should be aware that no third-party, to Advisor's knowledge, reviews any performance information that is created, prepared or distributed by or on behalf of Advisor to determine the accuracy of the returns or its compliance with any applicable presentation standards. When providing quarterly performance information to clients, Advisor endeavors to provide clients with time-weighted returns that are calculated on a uniform and consistent basis.

### NAMCO as Portfolio Manager

As noted above, Advisor is the only portfolio manager for the Program. Program clients should be aware that this practice of limiting the Program's offering of portfolio management services to those provided by Advisor creates a conflict of interest as this practice allows Advisor to retain a greater portion of the Program's wrap fees.

### **Tailoring of Advisory Services**

Advisor's investment advisory services are tailored to the specific needs of each client. At the outset of each new client relationship, the IAR will ascertain the client's investment objective(s), needs, and risk tolerance and, based on that information, recommend an asset allocation to one or more of Advisor's asset allocation strategies.

All clients, regardless of investment strategy, have the ability to impose reasonable restrictions, at any time, on the securities or types of securities to be held in their portfolios. Restrictions, however, are deemed "unreasonable" (1) if they would interfere with the ability of Advisor to make investment decisions in a timely manner or (2) if they would compel Advisor to make investment decisions that would be inconsistent with the client's investment objectives, time horizon and/or risk tolerance. Any investment restrictions or changes to such restrictions must be provided to Advisor in writing and signed by the client. Please note that the imposition of one or more investment restrictions could result in investment returns that are less optimal than the investment returns that would have been achieved if no investment restrictions were imposed on Advisor.

### **Wrap Fee Program Considerations**

With respect to the portfolio management services provided by Advisor, there is no difference in how Advisor manages Program accounts and how it manages its other advisory accounts. Clients should be aware that a portion of the Program's wrap fee paid by the client is retained by Advisor as compensation for its portfolio management services.

### **Performance-Based Fees and Side-By-Side Management**

Neither Advisor nor any IAR or other supervised person of Advisor accepts performance-based advisory fees.

## **Methods of Analysis, Strategies and Risk of Loss**

(Form ADV Part 2A, Item 7)

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.

### **Client Info Provided to Portfolio Managers**

(Form ADV Part 2A, Appendix 1 - Item 8)

Because Advisor is both the sponsor and sole portfolio manager of the Program, Advisor has complete access to all information about all Program clients and IARs have complete access to all information with respect to their Program clients. Furthermore, as IARs are generally the primary recipient of all information submitted by clients to Advisor, it is generally not necessary for Advisor to provide updated client information to its IARs.

### **Client Contract with Portfolio Managers**

(Form ADV Part 2A, Appendix 1 - Item 9)

Advisor does not impose any restrictions on the ability of Program clients to directly contact and/or consult with Advisor or their IAR.

### **Additional Information**

(Form ADV Part 2A, Appendix 1 - Item 10)

#### **Disciplinary Information**

The Advisor is required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of the Advisor or the integrity of the Advisor'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.

## **Financial Industry Activities and Affiliations** (Form ADV Part 2A, Appendix 1 - Item 11)

Investment Advisory Representatives may be affiliated with a FINRA member broker dealer and disclose any such affiliation. Paul McIntyre is the registered principal and Chief Compliance officer 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.

## **Code of Ethics**

(Form ADV Part 2A, Appendix 1 - Item 12)

The Advisor 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 the Advisor, 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 Advisor will not interfere with Advisor'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.

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

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

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Advisor'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. Advisor 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 Advisor'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, Appendix 1 - Item 13)**

NAMCO does not maintain custody of your assets, on which we advise, as these must be maintained in an account with what is considered a "qualified custodian," generally a broker-dealer or bank. NAMCO recommends that our clients use Fidelity Investments, SEI, Betterment Securities, or another similarly registered broker-dealer, as the qualified custodian. NAMCO is independently owned and operated and at the firm level is not affiliated with any broker-dealer, however its Chief Compliance Officer is registered under FINRA to provide compliance services to MSC-BD, LLC, a FINRA member broker dealer.

A Broker Dealer will hold your assets in an account and can buy and sell securities when we and/or you instruct them to. While we recommend that you use the above mentioned custodian/brokers, you will decide whether to do so, and with whom. We do not open the account for you, although we may assist you in doing so.

## **Review of Accounts**

**(Form ADV Part 2A, Appendix 1 - Item 14)**

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, or where their consolidated accounts of assets are held. Some custodians including Fidelity Investments, if they deem an account has not had "activity" for a particular month, no statement for that month will be sent.

Program clients, however, are advised that it is your responsibility to promptly notify the Advisor if there are ever any changes to your financial situation, goals, needs or investment objectives. Advisor generated reports are provided for client convenience only and should not be relied on for tax purposes. Clients should rely on their custodial account statements as the official record of their account(s).

## **Client Referral and Other Compensation**

(Form ADV Part 2A, Appendix 1 - Item 15)

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, Appendix 1 - Item 16)

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, Appendix 1 - Item 17)

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, Appendix 1 - Item 18)

Advisor does not vote client proxies or accept authority to vote client securities. Instead, Program clients will receive proxies and/or other solicitations directly from their account custodian or a transfer agent and maintain exclusive responsibility for (1) directing the manner in which proxies solicited by issuers of securities owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other types of events pertaining to the client's investment assets. Program clients may contact Advisor to discuss questions they may have with respect to a particular proxy and/or other solicitation, however, Advisor is under no responsibility to give any advice on how to vote such proxy.

## **Financial Information**

(Form ADV Part 2A, Appendix 1 - Item 19)

In regards to this Item, the Advisor is required to provide you with certain financial information or disclosures about its financial condition. The Advisor 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.

The Advisor is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to clients.

<b>Requirements for State Registered Advisers</b>	<b>(Form ADV Part 2A, Appendix 1 - Item 20)</b>
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The Advisor, NAMCO, is a registered investment advisor with the Securities and Exchange Commission. The Chairman and CEO 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.

NAMCO may only transact business in those states in which it is registered, or qualifies for an exemption or exclusion from registration requirements.

Investment Advisory Representatives of the Advisor 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.