

This brochure supplement provides information about Paul McIntyre that supplements the Naples Asset Management Co., LLC brochure. You should have received a copy of that brochure. Please contact Paul McIntyre if you did not receive Naples Asset Management Co., LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Paul McIntyre is also available on the SEC's website at www.adviserinfo.sec.gov.



Form ADV Part 2B – Individual Disclosure Brochure

for

Paul McIntyre

Personal CRD Number: 1002368

Managing Director & Chief Compliance Officer

Investment Adviser Representative

NAMCOA - Naples Asset Management Co., LLC
999 Vanderbilt Beach Road, Suite 200
Naples, FL 34108

OFFICE: (239) 593-5525

TOLL-FREE: 888.477.5525

FAX: 239.593.9731

pmcintyre@namcoa.com

UPDATED: 12/01/2020

Item 2: Educational Background and Business Experience

Name: Paul McIntyre **Born:** 1951

Education:

Professional Plan Consultant designee (PPC™), Center for Fiduciary Studies 2016

Accredited Investment Fiduciary designee (AIF®), Center for Fiduciary Studies 2015

Certified Retirement Counselor Certification (CRC®), International Foundation for Retirement Education (InFRE) - 2003.

Certified Retirement Administrator Certification (CRA®), International Foundation for Retirement Education (InFRE) - 2003

Dorsey Wright Technical Institute, Point and Figure Charting Certification - 2002

Certified Investment Consultants Program, (CIMC). George Washington University, Washington, DC. - 2001

Certified Financial Manager Program (CFM), Merrill Lynch, Donald T. Regan School of Advanced Financial Management - 1983

LUTC - Life Underwriter Training Courses I & II - 1979

Commercial Insurance Licensing & Training Certification, Michigan State University, East Lansing, College of Education - 1978

Bachelors Business Education, Eastern Michigan University - 1978

Business Background:

01/2004 - Present Managing Director & Chief Compliance Officer
Naples Asset Management Co., LLC

02/2004 - Present Compliance Officer
MSC-BD, LLC, FINRA Member Broker Dealer

11/2002 - Present Arbitrator Neutral ID : A32360

Financial Industry Regulatory Authority

11/1985 - Present

Continuing Education Provider
Instructor / Course Moderator

07/1978 - 2004

Various NASD Member Broker Dealer Firms
Registered Representative / Principal

Examinations & Licenses:

FINRA: Series 7 (General Securities) 1981

Series 99 (Financial Operations Principal) 2011

Series 79 (Mergers and Acquisitions) 2010

Series 24 (General Securities Principal) 1999

Series 63 (Blue Sky Law) 1982

Series 52 Municipal Securities Representative 2020

NASAA: Series 65 (Investment Adviser Law) 1995

Florida Life, Variable Annuity and Health License 2002

Georgia Life, Variable Annuity and Health License 2017

Florida Real Estate Agent License 2002

Georgia Real Estate Agent License 2018

Current Professional Designations:

AIF®

Paul McIntyre has been awarded the Accredited Investment Fiduciary® (AIF®) and Professional Plan Consultant™ (PPC™) designations from the Center for Fiduciary Studies™ (the Center), the standards-setting body for fi360.

The AIF designation signifies specialized knowledge of fiduciary responsibility and the ability to implement policies and procedures that meet a defined standard of care. The designation is the culmination of a rigorous training program, which includes a

comprehensive, closed-book final examination under the supervision of a proctor, and agreement to abide by the Code of Ethics and Conduct Standards. On an ongoing basis, completion of continuing education and adherence to the Code of Ethics and Conduct Standards are required to maintain the AIF and PPC designations.

Based near Pittsburgh, Pa., fi360 is the first full-time training and research facility for fiduciaries and conducts training programs throughout the United States and abroad. The Center for Fiduciary Studies confers the AIF designation as well as the Professional Plan Consultant™ (PPC™) designations.

PPC™

The PPC designation signifies specialized training on retirement plan management and administration and ERISA compliance. The designation is the culmination of a rigorous training program, including a comprehensive, closed-book final examination under the supervision of a proctor, and agreement to abide by the Code of Ethics and Conduct Standards. On an ongoing basis, completion of continuing education and adherence to the Code of Ethics and Conduct Standards are required to maintain the PPC designation.

PPC designation holders possess an ability to employ best practices that help plan sponsors run successful and compliant practices. The PPC designation is awarded to those who complete a curriculum based on ERISA regulations and industry best practices as it pertains to the management of a qualified plan.

About fi360

fi360 helps its investment advisory clients gather, grow, and protect client assets through better investment and decision-making. Since 1999, fi360 has been providing innovative solutions to financial services providers, including its AIF® and PPC® training programs, the fi360 Toolkit™ software, and fi360 Fiduciary Score®. Their vision is to be the leading provider of services that raise the level of professionalism in investment management.

The Center for Fiduciary Studies

The Center for Fiduciary Studies is the standards-setting body for Fi360 and is supported by a team of experienced investment practitioners, attorneys, educators, and other professionals. The Center for Fiduciary Studies develops and maintains the Prudent Practices™ defined in our handbooks and awards the Accredited Investment Fiduciary® (AIF®) and Accredited Investment Fiduciary Analyst® (AIFA®) professional designations. In addition, the Center is responsible for overseeing

the body of knowledge that forms the basis for its curriculum, examinations, and certifying qualifications.

CRC®

InFRE's Certified Retirement Counselor® (CRC®) is a retirement-specific, accredited certification that exists to raise the retirement readiness of the American Worker through professional mastery of subject matter, commitment to the retirement planning profession, adherence to a code of ethics, and continuing education.

The CRC Board of Standards and Policy Development (BOS) is the policy-making and oversight group for the CRC. The purpose of the BOS, as determined by InFRE's Board of Governors, is to independently establish the governing rules and regulations related to certification programs, make determinations regarding eligibility and all essential certification decisions, and provide mediation and interpretations for the program as needed by staff and other volunteer groups. In addition, the Board of Standards regulates the use of the CRC mark through trademark law by authorizing individuals who meet its certification requirements to use the marks.

The Handbook for Certified Retirement Counselors contains essential information Certificants need to know to maintain certified status, including a CRC Code of Ethics, meeting annual continuing education requirements and filing a Certificate Holders' Annual Statement which provide Certificants guidance to operate at the highest level of professional standards.

Infre

The International Foundation for Retirement Education® (InFRE) is a non-profit 501(c)(3) organization founded in 1997. Their mission is to raise the retirement readiness of the American worker. With InFRE, retirement-focused professionals have access to quality education and tools so they can assist employees and clients with their retirement preparedness needs. Website: www.Infre.org.

The purposes for which InFRE was formed are:

- Emphasize the need for individual and family personal responsibility in retirement planning and saving;
- Contribute to both national and family economic security by increasing awareness of the need for personal responsibility in retirement planning on the part of individuals and families;

- Provide an ongoing forum for industry, government and educators to be the voice and identifier of retirement risks and realities for the benefit of the general public; and
- Protect the general public by advancing recognition among retirement planning professionals of the need for continuing education, a code of ethics, and professional certification for retirement plan counselors.

Item 3: Disciplinary Information

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business.

Item 4: Other Business Activities

Paul McIntyre is a registered representative. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Naples Asset Management Co., LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to utilize the services any representative of Naples Asset Management Co., LLC in such individual's outside capacity.

Paul McIntyre is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Naples Asset Management Co., LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Naples Asset Management Co., LLC in their capacity as a licensed insurance agent.

Paul McIntyre is a continuing education provider for CPAs, Attorneys, Insurance Agents and Registered Representatives. He organizes, oversees and provides continuing education courses for industry professionals to help satisfy or supplement regulatory CE requirements.

Paul McIntyre is the Managing Director and Chief Compliance Officer of DST Investments, LLC, an entity that provides consulting and asset management on DST 1031 type investments. DST Investments, LLC does not offer any commissionable products but if they did, Naples Asset Management Co., LLC would always act in the best interest of the client.

Paul McIntyre is a commercial real estate agent. From time to time, he will offer clients advice or products from this activity. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Naples Asset Management Co., LLC always acts in the best interest of the client; including in the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Naples Asset Management Co., LLC in their capacity as a real estate agent.

Item 5: Additional Compensation

Paul McIntyre does not receive any economic benefit from any person, company, or organization, other than Naples Asset Management Co., LLC or as described above, in exchange for providing clients advisory services through Naples Asset Management Co., LLC.

Item 6: Supervision

As the Chief Compliance Officer of Naples Asset Management Co., LLC, Paul McIntyre supervises all activities of the firm. Paul McIntyre's contact information is on the cover page of this disclosure document. Paul McIntyre adheres to applicable regulatory requirements, together with all policies and procedures outlined in the firm's code of ethics and compliance manual.

