

This brochure supplement provides information about Steven Harder that supplements the Naples Asset Management Co., LLC brochure. You should have received a copy of that brochure. Please contact Steven Harder 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 Steven Harder is also available on the SEC's website at www.adviserinfo.sec.gov.



NAMCOA[®]
Registered Investment Advisor

Naples Asset Management Company[®], LLC

Form ADV Part 2B - Individual Disclosure Brochure

for

Steven Harder, CFP[®]

Personal CRD Number: 4145328

Investment Adviser Representative

NAMCOA - Naples Asset Management Co., LLC
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 Mooresville, NC 28117

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UPDATED: 9/7/2023

Item 2: Educational Background and Business Experience

Name: Steven Harder **Born:** 1973

Educational Background and Professional Designations:

Education:

- CFP® Financial Planning, College of Financial Planning
- Series 7 (General Securities)
- Series 24 (General Securities Principal)
- NASAA: Series 65 (Investment Adviser Law)
- Series 63 (Blue Sky Law)
- North Carolina Life and Health License

Post-Secondary Education

- MBA Finance, University of North Carolina at Charlotte
- BA in Marketing, Canisius College

Designations:

CFP® - Certified Financial Planner

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its

(1) high standard of professional education;

(2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances.
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP® Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- i. Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- ii. Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP® Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Background:

- 2023 - Present: Investment Advisor Representative, NAMCOA (Naples Asset Management Co., LLC)
- 2021 - 2023: Senior CFP Advisor, Vanguard Advisors

- 2019-2021: Product Manager of Retirement Plans, Wells Fargo Advisors
- 2014 - 2018: Financial Solutions Advisor, Merrill Lynch
- 2012-2014: Financial Advisor, Wells Fargo Advisors
- 2010-2011: Private Banker, Wachovia Bank
- 2006-2009: National Manager Retirement Center, LPL Financial
- 2000-2006: Wealth Management Consultant, TIAA

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

Steven Harder 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.

Item 5: Additional Compensation

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

Item 6: Supervision

As a representative of Naples Asset Management Co., LLC, Steven Harder is supervised by Paul McIntyre, the firm's Chief Compliance Officer. Paul McIntyre is responsible for ensuring that Steven Harder adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Paul McIntyre is (239) 287-3789.

