This brochure supplement provides information about Alyssa Rakovich that supplements the NAMCOA- Naples Asset Management Co., LLC brochure. You should have received a copy of that brochure. Please contact Alyssa Rakovich if you did not receive the NAMCOA - Naples Asset Management Co., LLC's brochure or if you have any questions about the contents of this supplement. Additional information about Alyssa Rakovich is also available on the SEC's website at www.adviserinfo.sec.gov.



Naples Asset Management Company[®], LLC

Form ADV Part 2B - Individual Disclosure Brochure

for

Alyssa Rakovich AIF®

Personal CRD Number: 3003477

Investment Adviser Representative

NAMCOA - Naples Asset Management Co., LLC 999 Vanderbilt Beach Road, Suite 200 Naples, FL 34108 Office: 239.593.5525 Ext. 119 Cell: 941.724.1208 Email: <u>arakovich@namcoa.com</u> Website: www.NAMCOA.com

Item 2: Educational Background and Business Experience

Name: Alyssa Rakovich Born: 1973

Educational Background and Professional Designations:

- BA, College of Charleston, Charleston, SC
- ETA Sigma Phi Latin and Ancient Greek Honor Society
- Strategic Operations of International Business Management University of Durham, Hatfield College, Durham England

Post-Secondary Education

- Vanderbilt University, Financial Planning
- University of Pennsylvania, Wharton Women's Management Forum

Examinations & Licenses:

- General Securities Sales Supervisor Options Module Examination Series 9
- General Securities Sales Supervisor General Module Examination Series 10
- General Securities Representative Examination Series 7
- Uniform Securities Agent State Law Examination Series 63
- Uniform Investment Adviser Law Examination Series 65
- Life, Annuity, Long-Term Care and Health Insurance Licenses: GA and PA

Current Professional Designations:

AIF® PPC® and DACFP

Alyssa Rakovich has been awarded the Accredited Investment Fiduciary[®] (AIF[®]) and Professional Plan Consultant[®] (PPC[®]) designations from the Center for Fiduciary StudiesTM (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 ConsultantTM (PPCTM) designations.

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 PracticesTM 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.

The DACFP is a professional designation Financial Industry Regulatory Authority now lists the Digital Assets Council of Financial Professionals Certificate in Blockchain and Digital Assets as a professional designation.

The DACFP announced in March that it introduced a revised and enhanced Certificate in Blockchain and Digital Assets program.

Financial professionals who complete the 15 CE-credit course can now display the CBDA credential, for Certified in Blockchain and Digital Assets

History of DACFP

Digital Asset Certified Financial Professional was conceived in 2018 by Ric Edelman, one of the top thought leaders in the financial services industry.

DACFP gives financial professionals the ability to establish expertise in blockchain technology and digital assets through its online self-study program, the Certificate in Blockchain and Digital Assets[®], webinars and conferences, video interviews with leaders in the field, the DACFP Yellow Pages and unmatched consulting services.

Business Background:

9/2018 - Present	Naples Asset Management Company, LLC Investment Adviser Representative
2/2016 - 9/2018	Advisory Group Equity Services LTD. Registered Representative
1/1998 - 10/2015	Morgan Stanley Registered Representative

Associations:

- 3/2011- Present US Committee for UN Women
- 3/2011- Present Through Women's Eyes
- 2/2001- Present Canter Thoroughbred Rescue
- 1/1991- Present Charleston Area Therapeutic Riding
- 6/2020 Present KnowTribe Sarasota
- 1/2020 Present American Heart Association Circle of Red

Item 3: Disciplinary Information

In 2015 Alyssa was terminated from Morgan Stanley due to a claim bought against her and Morgan Stanley by FINRA whereby FINRA accused Alyssa of engaging in outside business activity while under the employ of Morgan Stanley without seeking or receiving prior approval from her Member Firm – Morgan Stanley.

In 2017 Alyssa consented to being sanctioned by FINRA without admitting or denying their findings that she engaged in outside business activity while under the employ of Morgan Stanley without seeking or receiving prior approval from her Member Firm – Morgan Stanley. Alyssa was given a civil and administrative penalty of \$5,000 and suspended from Investment Advisory Service provisioning for 30 days. This matter was restricted to FINRA and did not involve an SEC violation.

Item 4: Other Business Activities

Alyssa Rakovich is a licensed insurance agent. From time to time, she 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.

Below are current business activities outside the scope of Naples Asset Management Company, LLC that Alyssa Rakovich is involved:

- INY LLC, 11161 E State Road 70 Ste 110-528 Lakewood Ranch, FL 34202 Position: Consultant 10/31/2016 to present. Business Activity: Provide various business consulting and training, approximately 1 hour a quarter consulting Not investment related.
- Phillips & Cohen Associates, Ltd, 1002 Justison St, Wilmington, DE 19801, Position: Director Strategic Partnerships Role: Business development 35 hours a week Not Investment Related.
- 3. The Token Authority 11161 E State Road 70 Ste 110-528 Lakewood Ranch, FL 34202 Position: Consultant Provides consulting education and training 2 hours a month Not Investment Related.
- LQD Assets LLC 11161 E State Road 70 Ste 110-528 Lakewood Ranch, FL 34202 Position: Consultant Provides consulting and education services. 2 hours a week Not Investment Related.

Item 5: Additional Compensation

Alyssa's main economic benefit is from Naples Asset Management Co., LLC in exchange for providing clients advisory services through Naples Asset Management LLC.

Item 6: Supervision

As a representative of Naples Asset Management Co., LLC, Alyssa Rakovich is supervised by Paul McIntyre, the firm's Chief Compliance Officer. Paul McIntyre is responsible for ensuring that Alyssa Rakovich 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.

