

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



Form ADV Part 2B – Individual Disclosure Brochure

for

Kevin E. Sullivan, AIF[®]

Personal CRD Number: 1250829

Investment Adviser Representative

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UPDATED: 07/15/2022

Item 2: Educational Background and Business Experience

Name: Kevin Sullivan

Born: 1960

Educational Background and Professional Designations:

Post-Secondary Education

Accredited Investment Fiduciary designee (AIF®)
Center for Fiduciary Studies 2022

Examinations & Licenses:

NASAA: Series 65 (Investment Adviser Law) 2022

North Carolina Life, Annuity and Health Insurance Resident License. Also, life and annuity licensed in the following states as a non-resident agent:

- Alaska
- Alabama
- Arizona
- Florida
- Georgia
- Illinois
- Indiana
- Michigan
- North Carolina
- Nevada
- Oklahoma
- South Carolina
- Tennessee
- Texas
- Virginia
- West Virginia
- Wyoming

Current Professional Designations:

AIF®

Kevin E. Sullivan has been awarded the Accredited Investment Fiduciary® (AIF®) designation 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.

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.

Business Background:

03/2022 - Present	Investment Adviser Representative NAMCOA - Naples Asset Management Company, LLC Naples, FL Investment, Insurance & Financial Planning Services.
12/2014 - Present	President, 50% Owner RIA Sources, LLC Mooresville, Managerial oversight of day-to-day operations.
08/2012 - Present	President, 50% Owner Infinite Wealth Advisors, LLC, High Point, NC Financial Consulting for Individual clients.
05/2018 - 03/2020	Chief Executive Officer (Interim) , Global Care Analytics Cornelius, NC Start-up Healthcare Technology Services Company
04/2008 - 07/2012	President 50% Owner North Carolina Center for Retirement and Estate Planning, High Point, NC. Insurance sales
3/2003 - 04/2008	Owner, ERC of the Triad High Point, NC. Insurance sales
2/2002 - 9/2002	Omni Advisor Group Huntersville, NC. Life Settlements
11/1999 - 2/2002	Vitex Inc, Executive Vice President, COO Mooresville, NC. Bank Technology Consulting
12/1996 - 9/1999	Siemens Health Systems, Consulting Practice Manager King of Prussia, PA. Healthcare Technology Consulting
9/1993 - 8/1996	John Hancock, Director of Managed Care. Boston, MA. Healthcare Third Party Admin. Services

Item 3: Disciplinary Information

Kevin Sullivan has two regulatory events that we believe are not material to a client's or prospective client's evaluation of this advisory business. His two Regulatory events are outlined below:

- a) In October 2010, the North Carolina Securities Division denied registration of Capital Management partners, doing business as the North Carolina Center for Planning and Kevin Sullivan, for offering securities without obtain proper registrations and the lack of full disclosure.
- b) In September 2002, The North Carolina Securities Division entered a cease and desist against Omni Advisors Group and Kevin Sullivan, for selling fractional shares of life insurance settlements. North Carolina outlawed the sale of life settlements without a securities license in April 2002, earlier that year.

The details for both can be found on FINRA's Advisor Check system or the IAPD. The FINRA link is <http://www.finra.org/brokercheck>; the IAPD link is www.adviserinfo.sec.gov.

Item 4: Other Business Activities

Kevin E. Sullivan is a licensed insurance agent. He will offer clients advice or insurance 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.

Kevin Sullivan is a 50% owner of RIA Sources, LLC. His hours are limited during the month to approximately 10 hours.

Kevin Sullivan is a 50% owner, Hair Trigger Arms, LLC, an entity that markets firearms and sells firearm accessories. Time spent is approximately 5 hours per month.

Kevin Sullivan is a 50% owner, Infinite Wealth Advisors, LLC, an entity formerly known as North Carolina Center for Retirement & Estate Planning, LLC, that provides retirement planning to clients. He also provides assistance with general financial planning, income planning, tax planning and customer service. Investment advice is offered to clients through Naples Asset Management Co., LLC. Insurance products are also offered from time to time during the planning process. Currently, Kevin spends about 160 hours plus on this activity per month.

Kevin Sullivan is a 50% owner, Wicked Holdings, LLC an entity set up to hold commercial office space he owns. Less than an hour spent each month on this entity.

Kevin Sullivan is a 100% Owner in Chaotic Holdings, LLC, which owns commercial property. Less than an hour each month is spent on this entity.

Kevin Sullivan is a 50% Owner in Marion West Stables, LLC, which owns rental property. Less than an hour is spent monthly on this entity.

Item 5: Additional Compensation

Kevin E. Sullivan 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, Kevin Sullivan is supervised by Paul McIntyre, the firm's Chief Compliance Officer. Paul McIntyre is responsible for ensuring that Kevin Sullivan 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.

