

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page



March 16, 2019

This is the Firm Brochure, also known as Form ADV Part 2, for Naylor & Company Investments, LLC (Naylor & Company), a wholly owned subsidiary of N&C Advisors, LLC, which is owned and managed by Chad D. Naylor.

Chad Naylor and Naylor & Company can be reached at the following locations:

Chad Naylor, Naylor & Company Investments, LLC
735 Miner Road, Orinda, CA 94563

or

101 California Street, Suite 2710, San Francisco, CA 94111

or

4900 Hopyard Road, Suite 100, Pleasanton, CA 94588

415-741-7280 (telephone)

chad@naylorinvest.com (email)

www.naylorinvest.com (website)

This brochure provides information about the qualifications and business practices of Naylor & Company, Chad Naylor, Dave Naylor, Dmitriy Bolotnyy and Daven Sharma. If you have any questions about the contents of this brochure, you may contact me at the address, phone number or email address listed above. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Naylor & Company is available on the SEC's website at www.advisorinfo.sec.gov.

Naylor & Company, Chad Naylor, Dave Naylor, Dmitriy Bolotnyy and Daven Sharma are registered investment advisors. However, being a registered investment advisor does not imply any particular level of skill or training, and merely denotes that we are registered to provide investment advice and portfolio management.

Item 2 Material Changes

In May of 2018, Naylor & Company became a wholly owned subsidiary of N&C Advisors, LLC. However, the owners of N&C Advisors (Chad Naylor and certain passive investors) are the same owners who owned Naylor & Company before the creation of N&C Advisors as a holding company.

Item 3 Table of Contents

Firm Brochure

- Item 1: Cover Page
- Item 2: Material Changes
- Item 3: Table of Contents
- Item 4: Description of Naylor & Company's Investment Advisory Business
- Item 5: Fees and Compensation
- Item 6: Performance-Based Fees
- Item 7: Types of Clients
- Item 8: Methods of Analysis, Investment Strategies and Risk of Loss
- Item 9: Disciplinary Information
- Item 10: Other Financial Industry Activities and Affiliations
- Item 11: Participation or Interest in Client Transactions and Personal Trading
- Item 12: Brokerage Practices
- Item 13: Review of Accounts
- Item 14: Client Referrals and Other Compensation
- Item 15: Custody of Funds
- Item 16: Investment Discretion
- Item 17: Voting Client Securities
- Item 18: Financial Information
- Item 19: Requirements for State-Registered Advisors

Supplements

- Item 1: Cover Page
- Item 2: Educational Background and Business Experience of Registered Reps
- Item 3: Disciplinary Information
- Item 4: Other Business Activities
- Item 5: Additional Compensation
- Item 6: Supervision
- Item 7: Requirements for State-Registered Advisors

Item 4 Investment Advisory Business

Naylor & Company provides investment advice, financial planning and portfolio management to individuals, partnerships, trusts and retirement plans. Naylor & Company has been in business since 2003, and is owned by N&C Advisors, which is owned by Chad Naylor (95.5%) and four passive investors (4.5%). Specifically, Naylor & Company has entered into a contractual relationship with three long-term clients who have collectively bought a 4.5% interest in Naylor & Company. Naylor & Company will insure that this relationship does not create any material conflicts of interests regarding fees, trading allocation or other items, and that this relationship does not adversely affect relationships with other clients.

Naylor & Company specializes in working with clients to establish investment portfolios of stocks, bonds, ETFs, mutual funds and select alternative private investments. Naylor & Company approaches investments with a fundamental analysis of each company for which it purchases stocks or bonds, or recommends alternatives. Naylor & Company seeks to find companies with reasonable valuations as determined by their price to earnings ratios, but with greater growth prospects over the long-term than the average company. Naylor & Company also invests in cyclical companies, whose earnings fluctuate with the growth of the economy.

Naylor & Company invests a significant portion of client accounts in the stocks of small and medium-sized companies. These stocks can be more volatile than the stocks of larger companies and there is a risk that the broader market may not recognize the value of these companies, especially over the short-term, which could lead to losses greater than those of the overall market.

Although Naylor & Company invests in many of the same stocks for most client accounts, it also tailors client accounts to the specific needs of the individual investor. Typically, this involves varying the amount of cash and bonds in a client's account to reduce the volatility of the overall portfolio of investments. Each client is interviewed with respect to their investment preferences and Naylor & Company will avoid investing in certain companies or industries that the client wishes to avoid.

Naylor & Company does not sponsor or participate in any WRAP fee programs. However, Naylor & Company does manage assets for other institutions including other investment advisors in a sub-advisor capacity and receives fees from those other institutions for the sub-advisory management. Naylor & Company also provides its Naylor & Company Core Composite strategy to certain Turnkey Asset Management Programs (TAMPs) and receives fees from those TAMPs.

As of March 16, 2019, Naylor & Company manages \$56 million of client assets on a discretionary basis.

Item 5 Fees and Compensation

Naylor & Company charges fees for its services based upon a percentage of assets under management. Fees are negotiable, but do not exceed three percent (3%) of assets per year. Fees are calculated and assessed quarterly in advance of the quarter (or in some instances, monthly in advance of the month) for which services are provided. In most instances, fees are collected directly from client accounts by the brokerage company used for the client account, typically, TD Ameritrade. In some instances, Naylor & Company bills the clients directly for its fees. Clients are also responsible for brokerage commissions and mutual fund fees. In certain cases, Naylor & Company may offer to charge eligible clients a percentage of the capital appreciation of an account (commonly referred to as a “performance fee”) as all or part of its fee. In the event Naylor & Company is not paid within 30 days of an invoice, Naylor & Company is entitled to charge interest and/or collect from Client any and all of its collection expenses, including reasonable attorneys’ fees.

Clients may terminate their investment advisory contracts with thirty (30) days written notice. In the event of termination, clients will receive a pro-rata refund of any prepaid fees for the remainder of the quarterly billing period.

Apart from the fees noted above from client accounts, neither Naylor & Company nor Chad Naylor accepts any fees or compensation from any brokerage, mutual fund company or any other source, except as noted above in Item 4 with respect to receiving management fees from other institutions for sub-advisory management and from certain TAMPs. Therefore, Naylor & Company has no incentive to select one investment over another apart from the client’s own interest.

Clients should be aware that lower fees for comparable services may be available from other investment advisory firms, however, those firms may or may not have obtained similar past performance or use comparable approaches to selecting investments.

Item 6 Performance-Based Fees

Naylor & Company may manage accounts that are charged a performance fee. Performance-based fee arrangements may create an incentive for Naylor & Company to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. Naylor & Company will manage this potential conflict by treating clients fairly, over time, in its allocation of investment opportunities among clients.

Item 7 Types of Clients

Naylor & Company works with individual clients, partnerships, trusts and retirement plans. Naylor & Company also manages assets for other institutions including other investment advisors in a sub-advisor capacity. Naylor & Company also provides its Naylor & Company Core Composite strategy to certain TAMPs.

Clients must have a minimum of \$100,000 to open an account with Naylor & Company. In some cases, Naylor & Company may negotiate a lower minimum account size for some special circumstances.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Naylor & Company approaches investments with a fundamental analysis of each company for which it purchases stocks or bonds, or recommends alternatives. Naylor & Company seeks to find companies with reasonable valuations as determined by their price to earnings ratios, but with greater growth prospects over the long-term than the average company. From time to time, Naylor & Company also invests client accounts in the stocks of some cyclical companies, whose earnings fluctuate with the growth of the economy.

Investing in stocks, ETFs, mutual funds, bonds and alternatives involves a risk of loss that clients should be prepared to bear. In addition, investing in these securities involves significant short-term fluctuations that clients should also be prepared to bear. Naylor & Company invests a significant portion of client accounts in the stocks of small and medium-sized companies. These stocks can be more volatile than the stocks of larger companies and there is a risk that the broader market may not recognize the value of these companies, especially over the short-term, which could lead to losses greater than those of the overall market.

Although Naylor & Company invests in many of the same stocks for most client accounts, it also tailors client accounts to the specific needs of the individual investor. Typically, this involves varying the amount of cash and bonds in a client's account to reduce the volatility of the account. However, Naylor & Company also invests some client accounts in more large company stocks, ETFs or mutual funds as their needs or wishes dictate. Each client is interviewed with respect to their investment preferences and Naylor & Company will avoid investing in certain companies or industries that the client wishes to avoid.

Item 9 Disciplinary Information

There has been no disciplinary action ever taken against Naylor & Company, Chad Naylor, David Naylor, Dmitriy Bolotnyy or Daven Sharma.

Item 10 Other Financial Industry Activities and Affiliations

Apart from those entities listed below, Naylor & Company has no affiliations with other investment advisors, brokers or other investment entities, apart from using TD Ameritrade, and Interactive Brokers as brokers for client accounts. Naylor & Company does have a relationship with Loring Ward and EQIS wherein the companies sub-manage some accounts for Naylor & Company and shares its fees with Naylor & Company. Naylor & Company, Chad Naylor, Dave Naylor, Dmitriy Bolotnyy and Daven Sharma do not receive any compensation from TD Ameritrade or Interactive Brokers.

Item 11 Participation or Interest in Client Transactions and Personal Trading

Naylor & Company, Chad Naylor, David Naylor, Dmitriy Bolotnyy and Daven Sharma will, from time to time, acquire securities for their own or family accounts, or for the accounts of other clients. Naylor & Company may give advice or take action with respect to its own accounts or the accounts of other clients that may differ in timing or action from the advice given to the client or action taken with respect to the client's account. Furthermore, Naylor & Company and its advisors may not acquire for a client's account a position in a security obtained for their own or family accounts or the accounts of other clients, if in the sole and absolute discretion of Naylor & Company, it is not for any reason practical or desirable to acquire a position in the security for client's account. When the same securities are purchased or sold for a client's account and for the accounts of Naylor & Company or its advisors, the Naylor family, Naylor & Company's passive investors or Naylor & Company's other clients, Naylor & Company will make every reasonable effort to achieve a substantially similar price for those securities.

These issues are disclosed to clients here in this Form ADV, Part II and in Naylor & Company's standard investment advisory contract.

Item 12 Brokerage Practices

Pursuant to the terms of its investment advisory contract, Naylor & Company exercises discretion for client accounts with respect to the securities bought and sold, amount of securities bought and sold, prices paid or obtained for securities, brokers used and commissions rates paid. The primary factor in the recommendation of brokerage firms is the cost of brokerage commissions and fees. Other factors include minimum account balances, timely execution of trades, accuracy and timeliness of account reports, and client wishes.

Item 13 Review of Accounts

Chad Naylor, Naylor & Company's chief executive officer, is responsible for reviewing all client accounts, including any client accounts managed by David Naylor, Dmitriy Bolotnyy or Daven Sharma. Accounts are reviewed at least on a monthly basis to determine appropriate security selection. In addition, accounts are reviewed whenever an appropriate security at an appropriate price becomes available for the account and sufficient funds are available for the purchase of the account, and whenever the client informs Naylor & Company of any changes in the client's financial objectives or resources.

Item 14 Client Referrals and Other Compensation

Naylor & Company, Chad Naylor, David Naylor and Dmitriy Bolotnyy do not receive any compensation from client referrals or any compensation other than the direct client fees noted above in Item 5, Fees and Compensation. Daven Sharma receives compensation from Naylor & Company in the form of referral fees according to the terms of the Investment Advisor Representative (IAR) Agreement applicable to Mr. Sharma's referrals. This referral fee arrangement is disclosed to all prospective clients with the Disclosure of IAR Arrangement. The fees paid by a client who engages Naylor & Company pursuant to the IAR Agreement are the same as the fees paid by clients for which the advisor pays no compensation to the IAR or any other IAR.

Item 15 Custody

Naylor & Company does not have custody of client funds. Instead, client funds are custodiated at independent brokers, such as TD Ameritrade and Interactive Brokers. The brokers send out monthly statements or send email notifications about the availability of monthly statements online. Naylor & Company sends (via email) quarterly statements to clients. Clients should review both sets of statements and insure accuracy between the two sets.

Clients will first provide written authorization permitting Naylor & Company to collect fees in this manner. Naylor & Company will send copies of its invoices to the independent broker/custodian at the same time they are sent to the client. The independent broker/custodian will send monthly statements to clients showing all disbursements, including the amount of any fees paid to Naylor & Company.

Item 16 Investment Discretion

Pursuant to the terms of its investment advisory contract, Naylor & Company exercises discretion for client accounts with respect to the securities bought and sold, amount of securities bought and sold, prices paid or obtained for securities, brokers used and commissions rates paid. Clients may discuss with Naylor & Company any limitations they would like to place on this discretion.

Item 17 Voting Client Securities

Naylor & Company does not vote client securities. From time to time, you may receive solicitations for proxies from various companies, typically forwarded to you from TD Ameritrade, and you may, if you choose, submit your votes on various corporate matters as instructed in the proxy materials. Feel free to contact Chad Naylor if you have any questions about these proxy materials.

Item 18 Financial Information

Naylor & Company does not have custody of client funds so Naylor & Company is not required to provide financial information.

Item 19 Requirements for State-Registered Advisers

Chad Naylor is the chief executive officer of Naylor & Company. Mr. Naylor was born in 1965, obtained a B.A., with highest distinction, from Indiana University in 1986 and a J.D., graduating summa cum laude, from Indiana University in 1990. From 1990 to 2002, Mr. Naylor practiced law in various law firms in San Francisco, while managing his own investments. From 2003 to 2005, Mr. Naylor worked part-time in the law department of Pacific, Gas & Electric Company and started Naylor & Company. On April 1, 2005, Mr. Naylor left the practice of law to manage Naylor & Company fulltime.

David Naylor is a Portfolio Manager for Naylor & Company. David was born in 1972, and obtained a B.A. from Indiana University in 1995. Before joining Naylor & Company, he was a registered investment advisor with his own firm, Naylor Investing.

Dmitriy Bolotnyy is the Director of Business Development. Dmitriy was born in 1989 and studied music at the Schenectady Community College from 2008-2010. Before joining Naylor & Company, Dmitriy held a senior position on the marketing team of IRTH Communications. In 2017, Dmitriy became a registered investment advisor with Naylor & Company.

Naylor & Company, Chad Naylor, David Naylor and Dmitriy Bolotnyy have never been found liable in any arbitration claim or in any civil, self-regulatory organization or administrative proceeding involving an investment or investment-related business, fraud, theft, bribery or dishonest practices.

Naylor & Company, Chad Naylor, David Naylor and Dmitriy Bolotnyy have no relationships or arrangements with any issuer of securities. Naylor & Company will disclose to clients any material conflict of interest regarding Naylor & Company, Chad Naylor, David Naylor and Dmitriy Bolotnyy that could reasonably be expected to impair the rendering of unbiased and objective advice.

Part 2B of Form ADV: Brochure Supplement for Chad Naylor

Item 1 Cover Page



March 16, 2019

Supplement for Chad Naylor

This is the Firm Brochure Supplement for Naylor & Company Investments, LLC (Naylor & Company), which is owned and managed by Chad D. Naylor.

Chad Naylor, David Naylor, Dmitriy Bolotnyy, Daven Sharma and Naylor & Company can be reached at the following addresses and phone numbers:

Naylor & Company Investments, LLC

735 Miner Road, Orinda, CA 94563

or

101 California Street, Suite 2710, San Francisco, CA 94111

or

4900 Hopyard Road, Suite 100, Pleasanton, CA 94588

415-741-7240 (telephone)

925-388-0795 (fax)

chad@naylorinvest.com (email)

dave@naylorinvest.com (email)

dmitriy@naylorinvest.com (email)

daven@naylorinvest.com (email)

www.naylorinvest.com (website)

This brochure provides information about the qualifications and business practices of Chad Naylor and supplements the Naylor & Company Firm Brochure, which consists of the pages of this document above. If you have any questions about the contents of this brochure, you may contact us at the address, phone number or email addresses listed above.

Additional information about Chad Naylor is available on the SEC's website at www.advisorinfo.sec.gov.

Item 2 Educational Background and Business Experience

Chad Naylor is the chief executive officer for Naylor & Company. Chad Naylor was born in 1965, obtained a B.A., with highest distinction, from Indiana University in 1986 and a J.D., graduating summa cum laude, from Indiana University in 1990. From 1990 to 2002, Chad Naylor practiced law in various law firms in San Francisco, while managing his own investments. From 2003 to 2005, Chad Naylor worked part-time in the law department of Pacific, Gas & Electric Company and started Naylor & Company. On April 1, 2005, Chad Naylor left the practice of law to manage Naylor & Company fulltime.

Item 3 Disciplinary Information

There has never been any disciplinary action taken against Naylor & Company or Chad Naylor.

Item 4 Other Business Activities

Chad Naylor does not engage in any business activities other than managing Naylor & Company.

Item 5 Additional Compensation

Naylor & Company and Chad Naylor receive no compensation for their investment advisory business other than the direct fees charged to clients, and the sub-advisory and TAMP fees noted in Item 5 of the Firm Brochure above.

Item 6 Supervision

Chad Naylor is responsible for the supervision of any employees or Investment Advisor Representatives (IAR) for Naylor & Company. Chad Naylor reviews all correspondence between the employees and the clients of Naylor & Company, and discusses any investment selections for those clients prior to making the investments. Chad Naylor also reviews all client accounts on a monthly basis and supervises and reviews all record-keeping for those clients. Chad Naylor supervises all trading and fee collections for client accounts, and reviews these items monthly.

Item 7 Requirements for State-Registered Advisers

There are no applicable additional requirements for state-registered advisers for Naylor & Company or Chad Naylor.

Part 2B of Form ADV: Brochure Supplement for David Naylor

Item 1 Cover Page



March 16, 2019

Supplement for David Naylor

This is the Firm Brochure Supplement for Naylor & Company Investments, LLC (Naylor & Company), which is owned and managed by Chad D. Naylor.

David Naylor and Naylor & Company can be reached at the following addresses and phone numbers:

Naylor & Company Investments, LLC
735 Miner Road, Orinda, CA 94563

or

101 California Street, Suite 2710, San Francisco, CA 94111

or

4900 Hopyard Road, Suite 100, Pleasanton, CA 94588

415-741-7240 (telephone)

925-388-0795 (fax)

dave@naylorinvest.com (email)

www.naylorinvest.com (website)

This brochure provides information about the qualifications and business practices of David Naylor and supplements the Naylor & Company Firm Brochure, which consists of the pages of this document above. If you have any questions about the contents of this brochure, you may contact us at the address, phone number or email addresses listed above.

Additional information about David Naylor is available on the SEC's website at www.advisorinfo.sec.gov.

Item 2 Educational Background and Business Experience

David Naylor was born in 1972 and obtained a B.A. from Indiana University in 1995. From 1995 to 2003, David Naylor managed his own investments. From 2003 to 2014, David Naylor also made various real estate investments. In 2012, David Naylor founded Naylor Investing. Since August 2014, David Naylor has served as Portfolio Manager for Naylor & Company.

Item 3 Disciplinary Information

There has never been any disciplinary action taken against Naylor & Company or David Naylor.

Item 4 Other Business Activities

David Naylor does not engage in any business activities other than working as Portfolio Manager for Naylor & Company.

Item 5 Additional Compensation

Naylor & Company and David Naylor receive no compensation for their investment advisory business other than the direct fees charged to clients, and the sub-advisory and TAMP fees noted in Item 5 of the Firm Brochure above.

Item 6 Supervision

Chad Naylor is responsible for the supervision of any employees or Investment Advisor Representatives (IAR) for Naylor & Company. Chad Naylor reviews all correspondence between the employees and the clients of Naylor & Company, and discusses any investment selections for those clients prior to making the investments. Chad Naylor also reviews all client accounts on a monthly basis and supervises and reviews all record-keeping for those clients. Chad Naylor supervises all trading and fee collections for client accounts, and reviews these items monthly.

Item 7 Requirements for State-Registered Advisers

There are no applicable additional requirements for state-registered advisers for Naylor & Company or David Naylor.

Part 2B of Form ADV: Brochure Supplement for Dmitriy Bolotnyy

Item 1 Cover Page



March 16, 2019

Supplement for Dmitriy Bolotnyy

This is the Firm Brochure Supplement for Naylor & Company Investments, LLC (Naylor & Company), which is owned and managed by Chad D. Naylor.

Dmitriy Bolotnyy and Naylor & Company can be reached at the following addresses and phone numbers:

Naylor & Company Investments, LLC
735 Miner Road, Orinda, CA 94563

or

101 California Street, Suite 2710, San Francisco, CA 94111

or

4900 Hopyard Road, Suite 100, Pleasanton, CA 94588

415-741-7240 (telephone)

925-388-0795 (fax)

dmitriy@naylorinvest.com (email)

www.naylorinvest.com (website)

This brochure provides information about the qualifications and business practices of Dmitriy Bolotnyy and supplements the Naylor & Company Firm Brochure, which consists of the pages of this document above. If you have any questions about the contents of this brochure, you may contact us at the address, phone number or email addresses listed above.

Additional information about Dmitriy Bolotnyy is available on the SEC's website at www.advisorinfo.sec.gov.

Item 2 Educational Background and Business Experience

Dmitriy Bolotny was born in 1989 and studied music at Schenectady Community College from 2008 to 2010. From 2010 to 2012, Dmitriy worked as a sales associate at the Apple store in Albany, New York. From 2012 to 2017, Dmitriy worked in a senior position in the marketing team at IRTH Communications. Since April 2017, Dmitriy has served as the Director for Sales and Marketing for Naylor & Company.

Item 3 Disciplinary Information

There has never been any disciplinary action taken against Naylor & Company or Dmitriy Bolotny.

Item 4 Other Business Activities

Dmitriy Bolotny does not engage in any business activities other than working as Portfolio Manager for Naylor & Company.

Item 5 Additional Compensation

Naylor & Company and Dmitriy Bolotny receive no compensation for their investment advisory business other than the direct fees charged to clients, and the sub-advisory and TAMP fees noted in Item 5 of the Firm Brochure above.

Item 6 Supervision

Chad Naylor is responsible for the supervision of any employees or Investment Advisor Representatives (IAR) for Naylor & Company. Chad Naylor reviews all correspondence between the employees and the clients of Naylor & Company, and discusses any investment selections for those clients prior to making the investments. Chad Naylor also reviews all client accounts on a monthly basis and supervises and reviews all record-keeping for those clients. Chad Naylor supervises all trading and fee collections for client accounts, and reviews these items monthly.

Item 7 Requirements for State-Registered Advisers

There are no applicable additional requirements for state-registered advisers for Naylor & Company or Dmitry Bolotnyy.

Part 2B of Form ADV: Brochure Supplement for Daven Sharma

Item 1 Cover Page



March 16, 2019

Supplement for Daven Sharma

This is the Firm Brochure Supplement for Naylor & Company Investments, LLC (Naylor & Company), which is owned and managed by Chad D. Naylor.

Daven Sharma and Naylor & Company can be reached at the following addresses and phone numbers:

Naylor & Company Investments, LLC
735 Miner Road, Orinda, CA 94563

or

101 California Street, Suite 2710, San Francisco, CA 94111

or

4900 Hopyard Road, Suite 100, Pleasanton, CA 94588

415-741-7240 (telephone)

925-388-0795 (fax)

daven@naylorinvest.com (email)

www.naylorinvest.com (website)

This brochure provides information about the qualifications and business practices of Daven Sharma and supplements the Naylor & Company Firm Brochure, which consists of the pages of this document above. If you have any questions about the contents of this brochure, you may contact us at the address, phone number or email addresses listed above.

Additional information about Daven Sharma is available on the SEC's website at www.advisorinfo.sec.gov.

Item 2 Educational Background and Business Experience

Daven Sharma

- Year of birth: 1959

Educational Background

- The University of Delhi, India; Bachelors of Arts in Accounting

Certified Public Accountant

Certified Financial Planner™ (CFP®)

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. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

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 has 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, administered in 10 hours over a twoday period, 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:

- 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

- 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 Experience

- Naylor & Company; Investment Advisor Representative; 7/01/2018 to Present
- Strategic Advisors; President/CEO/Investment Advisor Rep; 4/2007 to Present
- Abundance Insurance Solutions; President/Insurance Agent; 6/2014 to Present
- Academy of Financial Planning; Founder; 5/2016 to Present
- Daven Sharma; Sole Proprietor dba Davis & Co.; Tax and Investment Consultant; 3/2017 to Present
- Blackline Partners, LLC, Tax and Book-Keeping services; Contractor; 7/2015 – Present
- Daven Sharma, Sole Proprietor dba Financial Abundance Academy; Public Speaker; 1/2016 – Present
- Davis & Company, A Professional Accountancy Corporation; President/CEO; 7/2002 – 06/2015
- Daven Sharma Insurance Services; Insurance Agent; 8/1997 to 5/2014
- Genworth Financial Securities Corp; Registered Representative; 9/2002 to 2/2007

Item 3 Disciplinary Information

There has never been any disciplinary action taken against Naylor & Company or Daven Sharma.

Item 4 Other Business Activities

Mr. Sharma is an independent insurance agent (Life and Health Licensed). He spends approximately 25% of his work month on this activity, which is considered investment related. Mr. Sharma may recommend these services to Clients. With the ability to work as a Client's insurance agent and investment adviser representative, this could be viewed as a conflict of interest because each service pays a separate fee or commission. However, Mr. Sharma mitigates any conflicts of interest to the best of his ability by placing the Clients' interests ahead of his own and through the implementation of policies and procedures that address the conflict.

Mr. Sharma is also a consultant with Blackline Partners, LLC that provides tax and bookkeeping services through its many offices across California. These businesses are not investment related. He spends approximately 25% of his work month on these activities with some during trading hours. Mr. Sharma may recommend these services to Clients. With the ability to work as a Client's accountant and investment adviser representative, this could be viewed as a conflict of interest because each service pays a separate fee or commission. However, Mr. Sharma mitigates any conflicts of interest to the best of his ability by placing the Clients' interests ahead of his own and through the implementation of policies and procedures that address the conflict.

Mr. Sharma is a Sole Proprietor doing business as Davis & Company. In this capacity, Mr. Sharma provides tax planning and investment advice to clients. He spends approximately 10% of his time in this business. This could be viewed as a conflict of interest because Mr. Sharma may charge a fee or commission for these services. However, Mr. Sharma mitigates any conflicts of interest to the best of his ability by placing the Clients' interests ahead of his own and through the implementation of policies and procedures that address the conflict.

Mr. Sharma is a founder of a non-profit organization called "Academy of Financial Planning". He spends approximately 5% of his time in his "not-for-profit" business. This does not create a conflict of interest.

Mr. Sharma is a Sole Proprietor doing business as Financial Abundance Academy. In this capacity Mr. Sharma acts as a Public Speaker. He spends approximately 5% of his work month on these activities with some during trading hours. Mr. Sharma may recommend these seminars to Clients. This could be viewed as a conflict of interest because Mr. Sharma may charge a fee or commission for these services. However, Mr. Sharma mitigates any conflicts of interest to the best of his ability by placing the Clients' interests ahead of his own and through the implementation of policies and procedures that address the conflict.

Item 5 Addition Compensation

Naylor & Company and Daven Sharma receive no compensation for their investment advisory business other than the direct fees charged to clients, and the sub-advisory and TAMP fees noted in Item 5 of the Firm Brochure above. Daven Sharma also receives referral fees from Naylor & Company as noted in Item 14 of the Naylor & Company Firm Brochure.

Item 6 Supervision

Chad Naylor is responsible for the supervision of any employees or Investment Advisor Representatives (IAR) for Naylor & Company. Chad Naylor reviews all correspondence between the employees and the clients of Naylor & Company, and discusses any investment selections for those clients prior to making the investments. Chad Naylor also reviews all client accounts on a monthly basis and supervises and reviews all record-keeping for those clients. Chad Naylor supervises all trading and fee collections for client accounts, and reviews these items monthly.

Item 7 Requirements for State-Registered Advisors

There are no applicable additional requirements for state-registered advisors for Naylor & Company or Daven Sharma.