

<p>Item 1. <u>Introduction</u></p>	<p>CapitalRock Financial, LLC d/b/a Naples Wealth Planning (“Naples Wealth Planning”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.</p>
<p>Item 2. <u>Relationships and Services</u></p>	<p>What investment services and advice can you provide me? We offer investment advisory services to retail investors, including investment management services on a discretionary or non-discretionary basis. (e.g. establishing an investment policy statement, asset allocation, portfolio construction, investment management and supervision), financial planning services, and consulting services. Discretion refers to whether the NWP advisor has to obtain your prior consent before making trades.</p> <p>Monitoring While the underlying securities within Investment Management Services accounts are periodically monitored, these accounts are reviewed no less frequently than annually. Accounts are reviewed in the context of each client's stated investment objectives and guidelines, ensuring that the structure of the portfolio is coordinated with these objectives. Typically, no formal reviews will be conducted for Financial Planning Services clients unless otherwise contracted for at the inception of the advisory relationship. Client accounts for consulting services will be reviewed as contracted for at the inception of the advisory relationship.</p> <p>Reviews may be triggered by material market, economic or political events, cash inflow or outflow to/from the portfolio or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).</p> <p>Investment Authority Investment Management Services are provided on both a discretionary and non-discretionary basis. When discretionary, the adviser is allowed to buy and sell investment in the clients’ account without obtaining permission from the client in advance of trades. Of course, financial professionals utilizing discretion will manage the client's assets in accordance with what NWP deems to be in the client's best interest based on the client’s investment objectives and guidelines. Clients will retain individual ownership of all securities in their account.</p> <p>Limited Investment Offering We do not limit our investment offerings.</p> <p>Account Minimums and Other Requirements We do not impose a minimum account size for establishing a relationship.</p> <p>Additional information about Naples Wealth Planning services is available on Part 2 of our Form ADV, which is available here.</p> <p>Conversation Starters. Ask your financial professional—</p> <ul style="list-style-type: none"> • Given my financial situation, should I choose an investment advisory service? Why or why not? • How will you choose investments to recommend to me? • What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?
<p>Item 3. <u>Fees, Costs, Conflicts, and Standard of Conduct</u></p>	<p>What fees will I pay? We charge clients an investment management fee that is based on the market value of each client’s assets under management at the end of each calendar quarter. The specific Management Fee to be paid by a particular client is set forth in that client’s Investment Management Agreement. The annual investment management fee will not exceed 2.5% of assets under management. The amount paid to our firm and your financial professional generally does not vary based on the type of investments we select on your behalf. The asset-based fee reduces the value of your account and will be deducted from your account. Fee options for Financial Planning and Consulting Services can be hourly or fixed fee engagements, or an ongoing fixed fee retainer. We retain the right to modify fees at our sole and absolute discretion. Additional information about our firm’s fees are included in Item 5 of Part 2 of Form ADV, available here.</p> <p>The investment management fee with respect to each client account does not include certain other charges and expenses, including (a) brokerage charges, which are paid on a transactional basis, (b) dealer mark-ups or mark-downs on securities purchased or sold for an account through third-party dealers and (c) taxes. All fees paid to Naples Wealth Planning for investment advisory services are separate and distinct from the expenses charged by mutual funds and</p>

	<p>exchange-traded funds (“ETFs”) to their shareholders, if applicable. These fees and expenses are described in each fund’s or ETF’s prospectus.</p> <p>You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.</p> <p>Conversation Starter. Ask your financial professional—</p> <ul style="list-style-type: none"> • Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?
<p>Item 3. <u>Fees, Costs, Conflicts, and Standard of Conduct</u></p>	<p>What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?</p> <p>When we act as your investment adviser, we are held to a fiduciary standard that covers our entire investment advisory relationship with you. This means that we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice, we provide to you. Here are some examples to help you understand what this means.</p> <ul style="list-style-type: none"> • Should a client choose to implement the financial planning recommendations contained in the plan, Naples Wealth Planning may recommend its own services or that of other professionals (<i>i.e.</i>, attorney, accountant, insurance agent, and/or stockbroker). Clients are advised that a conflict of interest exists if Naples Wealth Planning recommends its own services for investments, the services of its affiliate, Capital Wealth Planning, LLC , for investments or the services of its affiliate, CapitalRock Insurance, LLC (“CRI”) for insurance. • We’ve established an institutional relationship with various broker/dealer-custodians, including, but not limited to, Charles Schwab & Co.’s Schwab Advisor Services. to assist in managing our client account[s]. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a potential conflict of interest since these benefits may influence our recommendation of this custodian over one that does not furnish similar software, systems support, or services. <p>Conversation Starter. Ask your financial professional—</p> <ul style="list-style-type: none"> • How might your conflicts of interest affect me, and how will you address them? <p>Additional information about conflicts of interest between Naples Wealth Planning and its clients is available on Part 2 of our Form ADV, which is available here.</p> <p>How do your financial professionals make money?</p> <p>In infrequent circumstances, our financial professionals receive a salary and may receive a discretionary bonus. Compensation is set with the intention of attracting and retaining highly qualified professionals. Compensation is based on a variety of factors, including the number, value and complexity of accounts under management, the performance of those accounts, and retention. More frequently, compensation is based on a flat percentage of the fees received by NWP based upon the contract with the financial professional or based upon a grid, which increases the amount paid to the financial professional the higher the total fees charged to clients of the financial professional in aggregate.</p>
<p>Item 4. <u>Disciplinary History</u></p>	<p>Do you or your financial professionals have legal or disciplinary history?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Visit Investor.gov/CRS for a free and simple search tool to research us and our financial professionals.</p> <p>Conversation Starter. Ask your financial professional—</p> <ul style="list-style-type: none"> • As a financial professional, do you have any disciplinary history? For what type of conduct?
<p>Item 5. <u>Additional Information</u></p>	<p>Additional information about our services can be found here. If you have any questions about the contents of this brochure or would like to request a copy of this relationship summary, please contact Brian Bruneau at (239) 260-9386.</p> <p>Conversation Starter. Ask your financial professional—</p> <ul style="list-style-type: none"> • Who is my primary contact person? Is he or she a representative of an investment-adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?