



IAPD Report

LOUIS GENE NAVELLIER

CRD# 1792046

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Please contact FINRA with any concerns.



IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



Report Summary

LOUIS GENE NAVELLIER (CRD# 1792046)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **06/15/2020**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	NAVELLIER & ASSOCIATES INC	CRD# 107568	03/02/1992

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **10** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration. Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
B	IFS FUND DISTRIBUTORS, INC.	24075	RENO, NV	11/13/2006 - 11/30/2009
B	NAVELLIER SECURITIES CORP.	34861	RENO, NV	12/13/1993 - 11/01/2006

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	2
Civil Event	2



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **10** jurisdiction(s) and 0 SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **NAVELLIER & ASSOCIATES INC**
Main Address: ONE E. LIBERTY, SUITE 504
RENO, NV 89501-2107
Firm ID#: 107568

	Regulator	Registration	Status	Date
IA	Delaware	Investment Adviser Representative	Approved	11/14/2013
IA	Iowa	Investment Adviser Representative	Approved	11/14/2013
IA	Louisiana	Investment Adviser Representative	Approved	11/13/2013
IA	Nevada	Investment Adviser Representative	Approved	03/03/1994
IA	New Mexico	Investment Adviser Representative	Approved	11/12/2013
IA	Texas	Investment Adviser Representative	Restricted Approval	02/16/1994
IA	Utah	Investment Adviser Representative	Approved	11/12/2013
IA	Vermont	Investment Adviser Representative	Approved	11/14/2013
IA	West Virginia	Investment Adviser Representative	Approved	11/15/2013
IA	Wisconsin	Investment Adviser Representative	Approved	11/12/2013

Branch Office Locations

NAVELLIER & ASSOCIATES INC
ONE EAST LIBERTY, SUITE 504
RENO, NV 89501



Qualifications

PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

This individual has passed 2 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
Investment Company Products/Variable Contracts Principal Examination (S26)	Series 26	10/20/1993
General Securities Principal Examination (S24)	Series 24	08/09/1991

General Industry/Product Exams

Exam	Category	Date
Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	07/06/1993
Non-Member General Securities Examination (S2)	Series 2	08/12/1988

State Securities Law Exams

Exam	Category	Date
Uniform Securities Agent State Law Examination (S63)	Series 63	03/14/1994
Uniform Investment Adviser Law Examination (S65)	Series 65	09/23/1992

PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
B	11/13/2006 - 11/30/2009	IFS FUND DISTRIBUTORS, INC.	CRD# 24075	RENO, NV
B	12/13/1993 - 11/01/2006	NAVELLIER SECURITIES CORP.	CRD# 34861	RENO, NV

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
01/2007 - Present	INVESTORPLACE MEDIA	NEWSLETTER WRITER	N	ROCKVILLE, MD, United States
11/2006 - Present	IFS FUND DISTRIBUTORS	REG. REP	Y	CINCINNATI, OH, United States
07/1987 - Present	NAVELLIER & ASSOCIATES	PRESIDENT & CHIEF INVESTMENT OFFICER	Y	RENO, NV, United States

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

LOUIS NAVELLIER IS RETAINED BY INVESTORPLACE MEDIA UNDER A PERSONAL SERVICES CONTRACT, AS A WRITER FOR NEWSLETTERS PUBLISHED BY INVESTORPLACE MEDIA.



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	2
Civil Event	2

Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

Disclosure 1 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought: Other: n/a

Date Initiated: 06/12/2020

Docket/Case Number: 3-19826

Employing firm when activity occurred which led to the regulatory action: Navellier & Associates, Inc.

Product Type: Other: Unspecified Securities

Allegations: The Securities and Exchange Commission ("Commission") deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Sections 203(e) and 203(f) of the Investment Advisers Act of 1940 ("Advisers Act") against Louis Navellier and Navellier & Associates, Inc. ("NAI", collectively, "Respondents").

After an investigation, the Division of Enforcement alleges that from at least 2010 to the present, Respondents acted as investment advisers pursuant to the definition in the Advisers Act.

From the founding of NAI through the present, Mr. Navellier was NAI's Chief Investment Officer and Chief Executive Officer. He also owned at least 75% of NAI during that time, increasing his ownership to 100% after August 2013. NAI has been registered with the Commission as an investment adviser since October 1987.



On June 2, 2020, a final judgment was entered against Respondents, permanently enjoining them from future violations of Sections 206(1) and 206(2) of the Advisers Act, in the civil action entitled Securities and Exchange Commission v. Navellier & Associates, Inc., et al., Civil Action Number 1:17-CV-11633, in the United States District Court for the District of Massachusetts. The final judgment also orders Respondents jointly and severally to pay disgorgement of \$28,964,571, including \$6,513,619 in prejudgment interest, as well as civil penalties against NAI in the amount of \$2,000,000 and against Mr. Navellier in the amount of \$500,000.

The Commission's complaint alleged that, from at least 2010 to approximately August 2013, respondents breached their fiduciary duties and defrauded their advisory clients and prospective clients through the use of marketing materials that included false and misleading statements regarding the performance of the firm's Vireo AlphaSector investment strategies that they offered.

In its February 13, 2020 Order granting the Commission's motion for partial summary judgment, the District Court found that Respondents knew there were misleading statements in their marketing materials and that there had been inadequate due diligence, yet they failed to inform their clients. Instead, as the court determined, the respondents continued to sell the Vireo Alpha Sector investment strategies despite their knowledge that representations about the strategies were false and misleading. The District Court concluded that each Respondent acted with scienter.

Current Status: Pending

Disclosure 2 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: CALIFORNIA DEPARTMENT OF CORPORATIONS

Sanction(s) Sought: Cease and Desist

Other Sanction(s) Sought:

Date Initiated: 06/03/1988

Docket/Case Number:

Employing firm when activity occurred which led to the regulatory action:

Product Type: No Product

Other Product Type(s):

Allegations: CONDUCTED UNLICENSED INVESTMENT ADVISORY ACTIVITIES UNDER THE NAME OF NAVELLIER & ASSOCIATES

Current Status: Final

Resolution: Order

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No



Resolution Date: 06/03/1988
Sanctions Ordered: Cease and Desist/Injunction
Other Sanctions Ordered:
Sanction Details: DESIST AND REFRAIN ORDER ISSUED FOR UNLICENSED INVESTMENT ADVISORY ACTIVITIES.

Reporting Source: Individual
Regulatory Action Initiated By: CALIFORNIA DEPARTMENT OF CORRECTIONS, SECURITIES DIVISION

Sanction(s) Sought: Cease and Desist

Other Sanction(s) Sought:

Date Initiated: 06/03/1988

Docket/Case Number: UNKNOWN

Employing firm when activity occurred which led to the regulatory action: NAVELLIER & ASSOCIATES, INC

Product Type: Other

Other Product Type(s):

Allegations: DISPUTE REGARDING WHETHER NAVELLIER & ASSOCIATES, INC. WAS PROPERLY REGISTERED AND THE SCOPE OF INVESTMENT CLIENTS NAVELLIER & ASSOCIATES, INC. COULD GIVE ADVISE TO.

Current Status: Final

Resolution: Consent

Resolution Date: 03/17/1989

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: THE STATE OF CALIFORNIA ISSUED NAVELLIER & ASSOCIATES, INC. AN INVESTMENT ADVISOR LICENSE WHICH WAS RETROACTIVELY SUSPENDED FOR TWO WEEKS FROM MARCH 17, 1989 TO MARCH 30, 1989, AND THEREAFTER THE SUSPENSION WAS LIFTED AND THE REGISTERED IS CURRENTLY IN GOOD STANDING.

Broker Statement THERE WAS A DISAGREEMENT BETWEEN NAVELLIER & ASSOCIATES, INC. AND THE STATE OF CALIFORNIA AS TO WHETHER NAVELLIER & ASSOCIATES, INC. WAS PROPERLY LICENSED AS A CALIFORNIA INVESTMENT ADVISOR. AS PART OF THE RESOLUTION, ON MARCH 17, 1989, THE STATE OF CALIFORNIA REGISTERED NAVELLIER AS AN INVESTMENT ADVISOR, BUT SUSPENDED HIS LICENSE FOR 2 WEEKS (3-17-1989 TO 3-30-89). CALIFORNIA AND NAVELLIER AGREED TO THE SUSPENSION WITHOUT NAVELLIER ADMITTING LIABILITY IN THE SETTLEMENT OF THE DISPUTE



Civil Event

This disclosure event involves an injunction issued by a foreign or domestic court in connection with investment-related activity, a finding by a domestic or foreign court of a violation of any investment-related statute or regulation, or an action dismissed by a domestic or foreign court pursuant to a settlement agreement.

Disclosure 1 of 2

Reporting Source: Regulator

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Relief Sought: Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Injunction
Monetary Penalty other than Fines

Date Court Action Filed: 08/31/2017

Product Type: No Product

Type of Court: Federal Court

Name of Court: U.S. District Court District of Massachusetts

Location of Court: Boston, Massachusetts

Docket/Case #: 17-cv-11633

Employing firm when activity occurred which led to the action: Navellier & Associates, Inc.

Allegations: SEC Litigation Release No. 23925, August 31, 2017: The Securities and Exchange Commission's complaint alleges that from 2010 to 2013, Navellier and his firm defrauded their clients and prospective clients, misleading them about the performance track record of investment strategies that the firm offered under a brand name. First, Navellier and his firm allegedly breached their fiduciary duty to clients and prospective clients by ignoring and concealing red flags that should have alerted them that the investment strategies had not performed as advertised. Second, Navellier's firm allegedly distributed materially false advertisements and client communications about the performance track record of the investment strategies. Navellier knew that the investment strategies track record could not be validated and, over time, concluded the track record was fabricated and that the investment strategies were based on a fraud. Eventually, he worried that the firm's prior false statements about the investment could get the firm into legal trouble (including with the Commission) so, in the summer of 2013, Navellier arranged to sell the line of business for approximately \$14 million. In this way, Navellier profited from the company's successful marketing of a fraudulent performance record, without correcting the firm's misrepresentations to its fiduciary clients or disclosing the conflicts-of-interest he and the firm had in selling the business. Through the activities alleged in this Complaint, Navellier and his firm, while acting as investment advisers, employed devices, schemes and artifices to defraud their investment advisory clients and have engaged in acts, transactions, practices and courses of businesses which operated as a fraud on their investment advisory clients, in violation of Sections 206(1) and (2) of the Investment Advisers Act of 1940 (Advisers Act). Navellier also aided and abetted the firm's violations of Advisers Act Sections 206(1) and (2). The Commission seeks entry of appropriate permanent injunctions, including an injunction prohibiting Defendants from further violations of the relevant provisions of the federal securities laws; disgorgement of Defendants' ill-gotten gains, plus pre-judgment interest; and, imposition of civil penalties due to the egregious nature of Defendants' violations.

Current Status: Final



Resolution: Judgment Rendered

Resolution Date: 06/02/2020

Sanctions Ordered or Relief Granted: Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Injunction
Monetary Penalty other than Fines

Capacities 1 of 1

Capacities Affected: n/a

Duration: Permanent

Start Date: 06/02/2020

End Date:

Monetary Sanction 1 of 3

Monetary Sanction: Disgorgement

Total Amount: \$28,964,571.00

Portion against individual: 28964571

Date Paid:

Portion Waived: No

Amount Waived:

Monetary Sanction 2 of 3

Monetary Sanction: Monetary Fine

Total Amount: \$500,000.00

Portion against individual: 500000

Date Paid:

Portion Waived: No

Amount Waived:

Monetary Sanction 3 of 3

Monetary Sanction: prejudgment interest on disgorgement, jointly and severally

Total Amount: \$6,513,619.00

Portion against individual: 6513619

Date Paid:

Portion Waived: No

Amount Waived:

Regulator Statement

On February 13, 2020, the United States District Court for the District of Massachusetts allowed the Commission's Motion for Partial Summary Judgment on Counts One and Two of the Complaint finding that the Defendant intentionally or recklessly violated Sections 206(1) and 206(2) of the Investment Advisers Act of 1940 ("Advisers Act"). Subsequently, the Commission moved, with Defendant's consent, to dismiss the remaining counts of the Complaint, which has been granted. Accordingly, on June 02, 2020, the Court enters judgment as follows: it is hereby ordered, adjudged, and decreed that Defendant is permanently restrained and enjoined from violating Sections 206(1) and (2) of the Advisers Act. Defendant is jointly and severally liable for disgorgement of \$28,964,571, together with



prejudgment interest of \$6,513,619. Defendant shall pay a civil penalty of \$500,000 to the Commission.

Disclosure 2 of 2

Reporting Source:

Individual

Initiated By:

JAMES COLLINS, MY CO-OWNER THROUGH OUR CORPORATION ICM, INC.

Relief Sought:

Other Relief Sought:

Date Court Action Filed:

07/02/1987

Product Type:

Other Product Types:

Court Details:

NO. 303022

Employing firm when activity occurred which led to the action:

CORPORATION ICM, INC.

Allegations:

MY CO-OWNER IN THE CORPORATION ICM, INC. ATTEMPTED TO ENJOIN ME FROM LEAVING OUR FIRM AND STARTING A COMPETING INVESTMENT ADVISORY FIRM.

Current Status:

Final

Resolution:

Other

Resolution Date:

08/28/1991

Sanctions Ordered or Relief Granted:

Other Sanctions:

Sanction Details:

I PREVAILED; THE COURT VACATED THE EX PARTE TEMPORARY RESTRAINING ORDER WHICH HAD BEEN IN EFFECT FOR 50 DAYS; UNTIL THE ISSUES COULD BE FULLY BRIEFED AND HEARD, AFTER I FILED MY OPPOSITION THE COURT REFUSED TO ENJOIN ME FROM GIVING INVESTMENT ADVICE OR OBTAINING NEW CLIENTS AND HELD THAT I WAS ENTITLED TO FORM A COMPETING INVESTMENT ADVISORY BUSINESS.

Broker Statement

MY CO-OWNER SUED TO PREVENT ME FROM FORMING A COMPETING INVESTMENT ADVISORY FIRM. THE STATE COURT RULED IN MY FAVOR AND ALLOWED ME TO FORM A COMPETING FIMR.



End of Report

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