

Richard L. Beneduci, Jr.

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This Brochure Supplement provides information about Mr. Beneduci that supplements the National Asset Management, Inc. Brochure. You should have received a copy of that Brochure. Please contact the Compliance Department at 561-981-1000 if you did not receive National Asset Management's Brochure or if you have any questions about the contents of this supplement.

Additional information about this financial advisor is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2- Educational Background and Business Experience

Full Name: Richard Louis Beneduci (Jr) CRD # 5948280

Year of Birth: 1991

Education: Babson College, BS

Business experience (for past five years):

- ❖ Investment Advisor Representative, National Asset Management, (03/2021-Present)
- ❖ Registered Representative, National Securities Corp., (03/2021- Present)
- ❖ Financial Advisor, Winslow, Evans & Crocker, (10/2018-03/2021)
- ❖ Financial Advisor/Portfolio Manager, Morgan Stanley, (06-2013-10/2018)

Item 3 - Disciplinary Information

Mr. Beneduci has no disciplinary history.

Item 4- Other Business Activities

Mr. Beneduci uses the business name ECAP Wealth Management. Mr. Beneduci uses this business name for marketing and/or tax purpose but offers securities and investment advice through the registered broker-dealer or registered investment advisor described below. National Asset Management is not affiliated with ECAP Wealth Management.

Mr. Beneduci is a registered representative with National Securities Corporation (“NSC”), member FINRA/SIPC, as well as an investment advisory representative (“IAR”) of NAM. Registered representatives of NSC provide securities brokerage services for commissions, and receive a portion of the brokerage commissions paid to NSC. They may also receive a portion of any ongoing distribution of service (trail) fees from the sale of mutual funds or from variable annuity purchases. The dual registration presents an inherent conflict of interest and an incentive to recommend investment products based on the compensation received, rather than on a client’s needs. However, in accordance with fiduciary duties of an IAR and as a matter of firm procedure, IARs assist clients in making decisions regarding whether to establish a brokerage or an advisory account (and determine the types of transactions that will take place through each account if a client has both accounts) based on the clients’ goals, objectives, risk tolerance and other factors. Further, as a matter of procedure, NAM does not generally permit front-end or back-end load mutual funds in the advisory program, or any other class that has high trail fees. If such mutual funds are transferred into an advisory account, advisory fees will be suppressed if a front-end or

back-end load has been charged or there are high trail fees. Clients have the option to purchase investment products through other broker-dealers or advisors.

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Item 5- Additional Compensation

There is no additional compensation to report for this financial advisor.

Item 6 - Supervision

NAM provides investment advisory and supervisory services in accordance with the NAM Policies and Procedures Manual. Rene Kageff has primary responsibility for supervising advisory activities in accordance with NAM's Policies and Procedures Manual. Such oversight will include regular review of client communications and investment advice offered by this financial advisor. Records of all client trades placed by this financial advisor are archived and available for review. Rene Kageff may be contacted at 561-869-5239.