

**ADV Brochure Part 2A –**

**ALLEN & COMPANY OF FLORIDA, INC.**

A Registered Investment Adviser

IARD #25

1401 South Florida Avenue

Lakeland, FL 33803

<http://AllenInvestments.com>



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Phone: (863) 688-9000

March 8, 2016

Registration does not imply a certain level of skill or training.

This brochure provides information about the qualifications and business practices of Allen & Company of Florida, Inc. If you have any questions about the contents of this brochure, please contact us at [CarolZ@AllenInvestments.com](mailto:CarolZ@AllenInvestments.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about **Allen & Company of Florida, Inc.** is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

## **2. MATERIAL CHANGES**

Our last Brochure was dated February 18, 2015. We have not had any material changes to that document.

This document addresses a written text format implemented by the Securities and Exchange Commission.

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See Part 2B, attached, for additional information about your Financial Advisor(s)

## **4. ADVISORY BUSINESS**

### **A. Our Company & Principals**

Allen & Company of Florida, Inc. (Allen & Company or ALCO) is a federally registered investment adviser (IARD #25) and has been as a broker/dealer offering investment advice registered with the Securities and Exchange Commission since 1932. The regulatory reforms in the 1990's began to make a distinction between broker/dealers that offered investment advice, and Investment Advisers, whose primary business was that of giving investment advice for a fee. Allen & Company submitted and became separately registered under the Investment Advisers Act of 1940 in 2000. In all, Allen & Company has been providing its clients with investment advice since 1932.

Allen & Company of Florida, Inc. is wholly owned by Allen & Company Financial Corporation, Mr. Ralph Carter Allen is currently the majority owner and Chairman.

### **B. Type of Services we offer.**

At Allen & Company of Florida, Inc we offer investment supervisory services primarily on a non-discretionary basis, although a Portfolio Investment Management (PIM) account can be established for you if you desire or need discretionary management. Through our Financial Planning services we will help you develop a plan to obtain your financial goals; you may then implement that plan with the assistance of the advisory programs we offer (see 5A below.)

### **C. Customization of Accounts & Restrictions on Investments**

Our services are offered on a customized based and tailored to each client(s) stated investment objectives and needs. After a personal evaluation of your financial situation and objectives, we will work with you to identify your risk tolerance and present the various investment products that will help you obtain your investment goal(s). If needed, and as mutually agreed to by us, you may restrict certain type of investments in your account.

### **D. Wrap Fee Programs**

We offer asset management through several wrap fee programs sponsored by Wells Fargo Advisors a division of Wells Fargo Bank. As of April 2013 we may also offer advisory services to participants in retirement products sponsored by TIAA-CREF's Individual & Institutional LLC, through their Advisors Network (a wholly-owned subsidiary of Teachers Insurance and Annuity Association of America.)

After your Financial adviser works with you to evaluate your personal financial situation, he or she will help you select the program that will meet your individual investment objectives. The assets in your wrap program account may be exclusively invested in Mutual Funds, equities, ETF's (Exchange-traded funds) or any combination of those, or other investments that are allowed in the wrap program, which will depends upon the program selected by you. You will receive a detailed brochure from the Sponsor outlining additional specifics of your chosen program.

Note that the universe of allowable investments in each wrap program is limited by the plan's sponsor; in accordance with the parameters and objectives of the particular program portfolio selected. We offer the Private Investment Program and Networks Programs (also wrap programs) for those clients that wish to be able to select from a wider range of products.

When you participate in a wrap program, your net fees generally include management fees, performance reporting, and transaction fees and may also include custody fees. Non-wrap programs charge these fees separately, and the net cost of a non-wrap program could be higher or lower than the cost of the combined services you receive under a wrap program. Additionally, Allen & Company and your financial adviser will share in a portion of the management fees that are charged to you.

#### **E. Client Assets Managed by Us.**

As of March 4, 2016 our non-discretionary assets under management totaled \$631,600,000.00

### **5. FEES AND COMPENSATION**

#### **A. Compensation**

Our fees are calculated based upon your assets (i.e. the total value of securities, money market funds and cash) under management. The following are programs we offer, and fees you will pay. One program (The Network Portfolio) has an option to separate execution costs (i.e. commissions/ mark-downs and mark-ups) from investment advisory fees.

With the exception of the alternatives offered by the Network Portfolio, your fees will include investment management, which includes portfolio monitoring and reporting, clearance, and purchase and sales transaction costs. Fees will not include things such as transaction fees (e.g. wires and transfers) other charges (e.g. FedEx.) Commissions and other fees will be charged on assets held outside of your wrap account (see "C" below.) Fees for accounts may be adjusted for multiple accounts. You should refer to the fee schedule noted in your contract to confirm the schedule applicable to your account.

#### **Allocation Advisor Program Fees**

**Portfolios: Strategic ETF, CAAP Foundation, Ibbotson Strategic ETF Program and Ibbotson Strategic Mutual Fund & ETF:**

<b>Minimum Account Size is \$25,000</b>	
Eligible Assets	Annualized Fee
First \$250,000	1.75%
Next \$750,000	1.00%
Over \$1,000,000	0.75%

**Portfolios: CAAP Plus & Laffer Global ETF Portfolio**

**Minimum Account Size is \$50,000**

Eligible Assets	Annualized Fee
First \$250,000	2.50%
Next \$750,000	2.00%
Over \$1,000,000	1.50%

### **Asset Advisor Program Fees**

**Until May 1, 2011 the Minimum Account Size is \$50,000**

**After May 1, 2011 the Minimum Account Size is \$25,000**

Eligible Assets Value	Annualized Fee
First \$250,000	3%
Next \$750,000	2.5%
Over \$1,000,000	2%

### **Compass Program Fees**

**Portfolios: Value Investors or Blue Chip Advantage**

**Minimum Account Size \$50,000**

Total Account Value*	Annualized Fee
First \$250,000	2.5%
Next \$750,000	2.0%
Over 1,000,000	1.5%

The fee is based on account size and an assumed active equity portfolio.

### **Diversified Managed Allocations “DMA” Program Fees**

**Portfolios: Optimized Blends and Customized Blends**

**Minimum Account Size \$150,000**

Total Account Value*	Annualized Fee
First \$250,000	3.0%
Next \$750,000	2.5%
\$1,000,000	2.0%

### **FundSource Program Fees**

**Portfolios: Optimal Blends, Customized Blends & Custom Choice**

**Minimum Account Size \$25,000**

Account Asset Value*	Annualized Fee
First \$250,000	1.75%
Next \$750,000	1.5%
Over \$1,000,000	1.15%

### **Investment Management (PIM) Fees**

**Minimum Account Size \$50,000**

Account Asset Value*	Annualized Fee
First \$250,000	3.0%
Next \$750,000	2.5%
Next \$1,000,000	negotiable

### **Masters Program Fees**

**Portfolios: Equity and Balanced or Fixed**

**Minimum Account size is \$100,000**

**Equity & Balanced Fees:**

Total Account Value*	Quarterly Fee
Over \$2,000,000 .	negotiable

<u>Fixed Account Fees:</u>		
Total Account Value*	Quarterly Fee	Annualized Fee
First \$250,000	.4375%	1.75%
Next \$750,000	.3125%	1.25%
\$1,000,000- \$2,000,000	.25%	1.0%

### **Network Fees**

**Minimum Account Size is \$100,000**

Fees may be Either on an all inclusive fee of 3% per annum, with no additional charges for execution (i.e. commissions/mark-down or mark-up) or investment management; Or, on the basis of payment for individual execution services with a separate fee for investment management.

### **Pathways Program Fees**

**Portfolios: Optimal Blends, Customized Blends & Russell Funds**

#### **Minimum Account \$25,000**

Account Asset Value*	Annualized Fee
First \$250,000	1.75%
Next \$750,000	1.5%
Over \$1,000,000	1.15%

### **Private Investment Management “PIM”**

#### **Minimum Account \$50,000**

Account Asset Value*	Annualized Fee
First \$250,000	3.0%
Next \$750,000	2.5%
Over \$1,000,000	negotiable

### **TIAA-CREF**

#### **No Minimum Account size**

Annual fee maximum is 1.25%

## **B. Deduction of our fees.**

You will pay fees for your account on a quarterly basis, unless we agree otherwise. The fees are calculated and billed based upon the date the account agreement is accepted, based upon the initial value of the account, and covers the remainder of the calendar quarter. Client agreements allow the Clearing Agent to deduct fees on a quarterly basis, in advance, according to the fee schedule in your contract, unless you have made other arrangements.

## **C. Other Fees and Expenses**

In addition to the management fees described above in “A”, your account may incur the following charges: Custody, transfer fees, wire fees, priority mail or postage, mutual fund fees (management & administrative), brokerage fees and commissions, mark-ups/down (if not in a wrap program) and margin interest (if margin account.)

See Item 12 for additional information about these fees.

#### **D. Payment of Fees In advance.**

Fees are charged in advance. If for any reason you decide to terminate your account, we require a written five (5) day advance notice to terminate your account. Upon receipt of your written termination notice we will pro-rate the fees charged in your account for the actual days managed and refund any unearned fees to you. Some accounts may also be charged a small start up fee.

#### **E. Other compensation we may receive**

In addition to our receipt of advisory fees, we also receive additional compensation from the activity in your account in the form of marketing service fees for mutual funds (i.e. 12b-1 fees) purchased in your account. In the event your account is a qualified ERISA account, those fees will be credited to the Plan. Our advisors may also receive compensation for transactions (brokerage fees/commissions) executed in your account IF those assets are held outside of one of the wrap accounts described above.

If we are managing a Network account on your behalf we may recommend both load and no-load mutual funds. In the event these funds are recommended, we may receive sales compensation via their execution through our affiliated broker dealer. Receipt of these forms of additional compensation may be a conflict of interest in that it could be an incentive for your portfolio manager to recommend products for your account based upon the amount of additional compensation they receive. We will supervise your account to assure that any recommendations made are in accordance with your investment objectives and goals. On occasion you may receive communications from us to confirm that the activity in your account is in accordance with your instructions and that you are aware of the additional compensation being paid. We do not reduce our advisory fees in ratio to our other compensation received from commissions and/or markups or markdowns. You are not required to direct the transactions in your account to our affiliate; you may direct the transactions in your account through a broker/dealer of your choice.”

For additional information please see Item 14, “Client Referrals and Other Compensation.”

### **6. PERFORMANCE BASED FEES and SIDE-BY-SIDE MANAGEMENT**

Allen & Company does not manage accounts for a performance based fee, or share of capital gains.

### **7. TYPES OF CLIENTS**

We manage assets for the following types of clients; individuals, banks, pension and profit sharing plans, trusts and estates, charitable organizations, and corporations. We do not have any special fees or requirements for our accounts in addition to the fee schedule or minimum account size noted in item 5, above.



## **8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES and RISK OF LOSS**

We may use various methods to assist us in managing your account, including long and short term trading, the use of margin and options.

We use several methods of analysis to help us manage your account. Charting will help us evaluate the movement (i.e. trend lines) of your positions in bull (up) and bear (down) markets, along with support levels and sector analysis, which are a part of the technical analysis of a particular stock. Although this assists us with evaluating market risk and profitability it is not a definitive predictor of a stocks value.

We may also use fundamental analysis, which is when we are looking at the financial and product strength of a company and considering its competitors. We may also include as part of this analysis the position a particular company has on a global economic scale. Both fundamental and technical analysis often includes these fundamental factors. Fundamental will focus on the long(er) term behavior of stocks, while technical will try to forecast shorter (less than 6 month) market trends.

Another method we use is cyclical analysis, which looks at the growth of a stock, versus various events that might affect the price of stock at a given point in time. This evaluates the growth cycle (i.e. life cycle of a product or company) on a long, intermediate and short term.

If your objectives include frequent or short term trading strategies it can affect your investment results, have tax consequences and add to your overall cost of managing your portfolio.

There is no one method or combination of methods of evaluating a stock that is fool proof. In spite of the best analysis and strategies, a stock can move in the wrong direction, resulting in a loss of your investment.

## **9. DISCIPLINARY INFORMATION**

We are required to disclose any legal or disciplinary events that might be material to your evaluation of us, our integrity or that you might find important in your evaluation of us. Neither Allen and Company nor any of its managing principals have any events or disclosure to make.

## **10. OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS**

### **A. Pending and Current Registrations with broker/dealers.**

The majority of our employees and all of our management personnel are dually registered with our both our investment adviser and our broker dealer. We do not allow our employees to register with an outside firm.

**B. Registrations or applications of our Firm or associated person(s) with futures commission, or commodity pool operators.**

We are not registered with the Commodities and Futures Trading Commission, nor do we advise clients on commodities markets.

**Material Relationships and Conflicts of Interest**

From time-to-time we may accept investment advisory clients as referrals from other registered investment advisers. Fees may be split between us and the other registered investment adviser. We do not pay a referral fee or share investment adviser fees with anyone who is not registered as an investment adviser. At the present time we have no current arrangements in effect

**D. Recommendation and selection of other investment advisers for your account(s.)**

We do not recommend other investment advisers, outside of the advisers that we work with in the wrap programs sponsored by Wells Fargo.

## **11. OUR CODE OF ETHICS**

### **Participation or Interest in Client Transactions and Personal Trading**

**A. Code of Ethics**

Our Code of Ethics covers our Firm's policies with regard to the conduct of the employees of our Firm. It requires their compliance with regulations, fiduciary duties and standards of conduct. It addresses areas such as their obligations to you, our client(s), personal securities transactions, trading and holdings, our review of the activity of access persons, and privacy and non-public information. If you would like a copy of this document please request it from the contact person shown on the top of this brochure.

**B. Participation or Interest In Client Transactions**

Our related broker/dealer may buy, as principal, securities from your account; they in turn may sell those securities to their brokerage clients. We will only do so with your written acknowledgement, and at the prevailing market price. Our preference is to conduct trades on a non-principal basis.

**C. Personal Trading**

Although our Firm allows employees to trade in the same securities as for your account, at no time may they receive a better price than you receive for your account, nor may they trade for their own accounts in amounts that could affect the price of a security. Their personal trading is closely monitored to assure that they are placing your interest ahead of their own.

## **12. BROKERAGE PRACTICES**

### **A. Factors in recommending or selecting brokers to execute trades**

#### **1. Research or Soft Dollar Benefits**

We do not receive research or soft dollar benefits for the execution of trades in your accounts.

#### **2. Brokerage for Client Referrals.**

In our selection or recommendation of broker/dealers for your account we do not consider any referrals from any broker/dealer or third parties.

#### **3. Directed Brokerage.**

Not all advisers require clients to direct brokerage. With your permission we only direct your business to our affiliate, based upon best execution. When our affiliate cannot provide best execution we will direct your trade elsewhere for execution services. Occasionally, a client will direct us to a certain broker dealer as they have a situation where they receive rebates from that broker dealer, in that event we do not monitor those execution costs unless directed to by the client.

### **B. Aggregation of Trades**

We aggregate trades whenever possible, as aggregated trades normally result in the best execution.

## **13. REVIEW OF ACCOUNTS**

On a quarterly basis you will receive a written report that will show your investments, your rate of return and profits/losses on your position. This will be compared to the indices that best represent your stated investment objective. Your financial adviser will review this material and be available to discuss it with you if you have any questions.

Additionally, on an annual basis accounts are randomly selected for review from your financial advisers supervisor. In addition, we have personnel from our supervisory staff randomly select and review accounts based upon exception reports (factors which note activity or performance that was unexpected.) These reviews are performed on a routine basis.

## **14. CLIENT REFFERALS and OTHER COMPENSATION**

We have a Solicitors Agreement with ePlan Advisers (ePlan) an unaffiliated company and Registered Investment Adviser pursuant to the 1940 Advisers Act, Solicitors will be compensated and their fee will be in addition fees charged by ePlan, all fees will be collected

by ePlan. With that exception, neither our Firm nor Financial Advisers receive any items of value, in the form of prizes, awards or items of economic benefit from non-clients.

Allen & Company may provide investment advisory services for accounts held at banks providing fiduciary or trust services. On occasion, if clients are in need of Fiduciary or Trust Services we may refer clients to either Raymond James Trust, N.A. (RJT) a national trust bank, or Bank of Tampa. Our services are limited to reviewing accounts and providing research and recommendations on investments held in the account(s) by either the Bank of Tampa or RJT. Trade execution, client reporting, and custody of the accounts and assets will be the sole responsibility of the custodial bank (either RJT or Bank of Tampa). We will receive a fee based upon the value of assets held in the account(s).

## **15. CUSTODY**

The qualified custodian for your account is First Clearing Corporation. They will be sending you quarterly account statements, unless you have monthly purchases, sales, deposits, withdrawals, or other activity that will generate a monthly statement. Our Firm will send you quarterly statements of your activities, and your performance; you should compare our statements to the custodians' statements and report any error immediately, preferably in writing to us, as well as the custodian.

## **16. INVESTMENT DISCRETION**

The majority of our accounts are supervisory, although we have accounts that we may manage on a discretionary basis as requested. Our discretion must be granted to us by you in writing and is limited to the purchase or sale of securities, we do not have the authority to make withdrawals or deposits to your account. If you have limitations on the type of investments we have discretion for, you must provide us those instructions in writing. If you would like us to make periodic withdrawals or payments from your account, that must also be done in writing.

## **17. VOTING CLIENT SECURITIES**

We do not vote proxies on behalf of our clients. Unless you revoke your consent, Wells Fargo Advisors will automatically vote proxies for investments in wrap programs sponsored by Wells Fargo Advisors. We believe this will better serve your interests by having Wells Fargo Advisors play an active role in voting proxies in aggregate on your behalf. If you would like a copy of the proxy voting policies please ask your advisor.

If you decide to retain the right to vote proxies you must provide written notice and will receive all proxies from your custodian, directly from the company, or the transfer agent. You may elect to receive these electronically as well. If you wish to discuss the matters contained in a proxy please call your financial adviser.

## **18. FINANCIAL INFORMATION**

### **A. Custody**

We do not have custody of your assets or cash. We do however collect management fees in advance and deduct them from your account with your written permission. (See item 5D, above.)

### **B. Our Financial Condition**

We do not have any financial condition that could reasonably be expected to impair our financial commitment to our clients.

**Part 2B of Form ADV:**

**1. Brochure Supplement**

**ALLEN & COMPANY OF FLORIDA, INC.**

A Registered Investment Adviser

IARD #25

1401 South Florida Avenue

Lakeland, FL 33803

<http://AllenInvestments.com>

Contact: Carol Zitzelberger [carolz@AllenInvestments.com](mailto:carolz@AllenInvestments.com)

Phone: (863) 688-9000

March 8, 2015

This Part 2B Brochure Supplement augments the ADV Part 1A, and should be reviewed by you as one document to provide you with information about Allen & Company of Florida, Inc. and your financial adviser. If you did not receive Part 2A, or have any questions about this brochure, please contact Carol Zitzelberger (see above.)

This brochure supplement provides information about the following Financial Advisers:

**The Allen, Albritton, Houghton & Elmhorst Group**

Ralph Carter Allen,  
Keith E. Albritton, and  
Virginia “Ginny” Allen Houghton  
Kurt Elmhorst

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## **Ralph Carter Allen**

### **2. Educational Background and Business Experience**

Mr. Allen has been with Allen & Company since 1964, and is the Chairman of the Board in addition to his responsibilities as Financial Adviser. He graduated in 1963 from St. Andrews College with a Bachelors degree in Finance. Born in 1941, he passed his first exam in the securities industry in 1964. In addition to being licensed as a registered representative and investment advisor agent, Mr. Allen received his Certified Wealth Strategist (CWS) in 2008 from Cannon Financial Institute. This designation is earned only after six months of comprehensive study and requires ongoing certification requirements. A person with the CWS designation has received special training in the management and protection of assets and client interaction.

### **3. Item Disciplinary Information**

Mr. Allen has no reportable disciplinary events.

### **4. Other Business Activities**

Mr. Allen is a partner of The Florida Avenue Building Partnership In Lakeland, which takes less than an hour of his time a month and receives no compensation for his involvement. Since 2010 Mr. Allen has been President of J. Everett Allen and Sons, where he devotes approximately 10 hours per month. He is also a Board Member of Florida Polytechnic University, donating about 5 hours of his time each month.

### **5. Additional Compensation**

Mr. Allen does not receive any additional bonuses based upon his sales, referrals or new accounts.

### **6. Supervision**

Activity in accounts managed by Mr. Allen may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company, performs those reviews; he may be reached at 863-688-9000

## **Keith E. Albritton**

### **2. Educational Background and Business Experience**

Mr. Albritton is both the President and Chief Executive Officer of Allen & Company, and has been with Allen & Company since 1996. Mr. Albritton graduated from the University of Florida in 1991 with a Bachelors Degree in Finance. He was born in 1969 and is a Florida native. He is a Financial Adviser and holds several certifications and designations as a Certified Financial Planner (CFP), Certified Investment Management Analyst (CIMA) and Certified Wealth Strategist (CWS.) Mr. Albritton received these certifications after specialized study periods ranging from six months to two years. These courses required a proficiency in insurance planning and risk management; employee benefits, invest, income tax, retirement and estate planning; as well as investment portfolio analysis and policies. Additionally, they require ongoing training to maintain the certification requirements.

### **3. Item Disciplinary Information**

Mr. Albritton has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Albritton is board member of the Salvation Army of Polk County, Florida, where he serves as Co-Chair and Treasurer. As a volunteer his position is unpaid and takes a couple of hours per month.

### **5. Additional Compensation**

Mr. Albritton does not receive any additional compensation bonuses based upon his sales, referrals or new accounts.

### **6. Supervision**

Activity in accounts managed by Mr. Albritton may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Ralph Allen, Chairman of Allen & Company who may be reached at 863-688-9000, performs those reviews.

## **GINNY ALLEN HOUGHTON**

### **2. Educational Background and Business Experience**

Ms. Ginny Houghton became a member of Allen & Company in 2007. She is a Financial Adviser and graduated in 1998 from the University of Alabama with a Bachelor's in Finance. Ms. Houghton, a Florida native, was born in 1976. Ginny was also a loan officer for Allen & Company during the period beginning 2002 and ending 2007. She obtained her Certified Wealth Strategist (CWS) in 2008 from Cannon Financial Institute. This designation is earned only after six months of comprehensive study and requires ongoing certification requirements. A person with the CWS designation has received special training in the management and protection of assets and client interaction.

### **3. Item Disciplinary Information**

Ms. Houghton has no legal or disciplinary events.

### **4. Other Business Activities**

Ms. Houghton is a Vice President and Board Member of JEA & Sons, a family business that involves about an hour of her time on a monthly basis. She is also a partner in a real estate holding partnership (S. Florida Building Partnership) in Lakeland; this is an hour a month time commitment for which she is not compensated. Additionally, she is also sits on the Board of the Lakeland Regional Health Foundation, and Chairs the Women in Philanthropy, located at 1324 Lakeland Hills Boulevard, Lakeland. Both of these are related to hospital and health care services. She devotes approximately 2 to 5 hours a month on these two boards, and is not compensated.



## **5. Additional Compensation**

Ms. Houghton does not receive any additional compensation bonuses based upon her sales, referrals or new accounts.

## **6. Supervision**

Activity in accounts managed by Ms. Houghton may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company, who may be reached at 863-688-9000, performs those reviews.

## **Kurt Elmhorst**

## **2. Educational Background and Business Experience**

Mr. Elmhorst came to work for Allen & Company in 2003 as a Financial Adviser. He has a B.S. from Florida Southern College, where in 2002 he also earned a Masters of Business Administration. Mr. Elmhorst was born in 1966. Kurt holds a Certified Financial Planner Certification (CFP) and is also a Certified Wealth Strategist (CWS). The CWS required special training in the management and protection of assets and client interaction and is conferred by Cannon Financial Institute. The Certified Financial Planner Board of Standards confers the CFP designation after taking courses in finance, insurance, and employee benefits; tax, estate, and asset protection; as well as retirement planning and ethics. Both certifications require ongoing training.

## **3. Item Disciplinary Information**

Mr. Elmhorst has no legal or disciplinary events.

## **4. Other Business Activities**

Mr. Elmhorst is not involved in any outside activities.

## **5. Additional Compensation**

Mr. Elmhorst does not receive any compensation from outside sources.

## **6. Supervision**

Activity in accounts managed by Mr. Elmhorst may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews.

**Part 2B of Form ADV:**

**1. Brochure Supplement**

**ALLEN & COMPANY OF FLORIDA, INC.**  
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Contact: Carol Zitzelberger [carolz@AllenInvestments.com](mailto:carolz@AllenInvestments.com)

Phone: (863) 688-9000

March 8, 2016

This Part 2B Brochure Supplement augments the ADV Part 1A, and should be reviewed by you as one document to provide you with information about Allen & Company of Florida, Inc. and your financial adviser. If you did not receive Part 2A, or have any questions about this brochure, please contact Carol Zitzelberger (see above).

This brochure supplement provides information about the following Financial Advisers:

**The Riggs, Lopez, Marotz, and Wright Group**

**Ronald L. Riggs,  
A. Fernando “Fred” Lopez,  
Cynthia Marotz, and  
Michael H. Wright**

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## **Ronald L. Riggs**

### **2. Educational Background and Business Experience**

Mr. Riggs has been with Allen & Company since 1994, and is a Financial Adviser. He obtained a Bachelors degree in education from Ashland University in 1966. He also obtained a Life Underwriter Training Council Fellowship (LUTCF) in 1975 from Purdue University. This designation means he has had specialized training in life and annuity insurance products, sales and ethics, and requires continuing education to maintain. Mr. Riggs was born in 1944 and first became licensed in the securities industry in 1994, he has been a Registered Investment Adviser since 1998.

### **3. Item Disciplinary Information**

Mr. Riggs was the subject of a consumer complaint that was resolved by the Firm's rescission of the transaction, no formal action was taken. Additional information may be found on the FINRA website.

### **4. Other Business Activities**

Mr. Riggs is not involved in any outside business activities.

### **5. Additional Compensation**

Mr. Riggs does not receive any additional compensation bonuses based upon his sales, referrals or new accounts.

### **6. Supervision**

Activity in accounts managed by Mr. Riggs may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews

## **Fernando "Fred" Lopez**

### **2. Educational Background and Business Experience**

Mr. Lopez began his career at Allen & Company in 2000 as a Financial Adviser. Mr. Lopez was born in New Jersey in 1967. In 1991 he graduated from Troy State University with a Bachelors Degree. He also obtained his Certified Wealth Strategist Certification (CWS) in 2008. This designation is earned only after six months of comprehensive study and requires ongoing certification requirements and required special training in the management and protection of assets. In addition he is a Certified Financial Planner (CFP) that is conferred by the Certified Financial Planner Board of Standards. To become a CFP he had to take multiple courses in: financial, insurance, employee benefits, tax, estate, and asset protection; as well as retirement planning and ethics. He must take continuing education to keep both of these designations.

### **3. Item Disciplinary Information**

Mr. Lopez was the subject of a consumer complaint that was resolved by the Firm's rescission of the transaction, no formal action was taken. Additional information may be found on the FINRA website.

#### **4. Other Business Activities**

Mr. Lopez is not involved in any outside activities.

#### **5. Additional Compensation**

Mr. Lopez does not receive any additional compensation bonuses based upon his sales, referrals or new accounts.

#### **6. Supervision**

Activity in accounts managed by Mr. Lopez may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews

### **Cynthia Marotz**

#### **2. Educational Background and Business Experience**

Ms. Marotz has been a Financial Adviser with Allen & Company since 2003. She graduated from Polk Community College in 1994 and obtained a BA in 1995 from Florida Metropolitan University. She was born in 1973. She is a Certified Wealth Strategist "CWS;" received from Cannon Financial Institute. A person with the CWS designation has received special training in the management and protection of assets and client interaction. Cynthia is also a Chartered Retirement Plans Specialist; earned from the College of Financial Planning. This designation signifies that she has passed exams demonstrating her knowledge of the design, installation, maintenance and administration of retirement plans. She must take continuing education to keep these designations.

#### **3. Item Disciplinary Information**

Ms. Marotz was the subject of a consumer complaint that was resolved by the Firm's rescission of the transaction, no formal action was taken. Additional information may be found on the FINRA website

#### **4. Other Business Activities**

Ms. Marotz is a Coach for Team Beach Body, and provides support and motivation to clients regarding their selection of workout programs and supplements. Her time devoted to this is minimal and outside of normal business hours. She receives a 25% commission on product sales.

#### **5. Additional Compensation**

Ms. Marotz does not receive any additional compensation bonuses based upon her sales, referrals or new accounts.

#### **6. Supervision**

Activity in accounts managed by Ms. Marotz may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews

### **Michael Wright**

## **2. Educational Background and Business Experience**

Mr. Wright is a Vice President for Allen & Company and has been with the company since 1999. He attended Louisiana State University where he obtained a BS in Finance. Born in 1970, Mr. Wright is a licensed Financial Adviser and obtained a Certified Financial Planner (CFP) designation in 2000, that is conferred by the Certified Financial Planner Board of Standards only after passing and taking multiple courses in financial, insurance, employee benefits, tax, estate, asset protection, retirement planning and ethics. He must take continuing education to keep this designation.

## **3. Item Disciplinary Information**

Mr. Wright has no legal or disciplinary events.

## **4. Other Business Activities**

Mr. Wright is not involved in any outside business activities.

## **5. Additional Compensation**

Mr. Wright does not receive any additional compensation bonuses based upon his sales, referrals or new accounts.

## **6. Supervision**

Activity in accounts managed by Mr. Wright may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company, who may be reached at 863-688-9000, performs those reviews

**Part 2B of Form ADV:**

**1. Brochure Supplement**

**ALLEN & COMPANY OF FLORIDA, INC.**  
A Registered Investment Adviser

IARD #25

1401 South Florida Avenue

Lakeland, FL 33803

<http://AllenInvestments.com>

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Phone: (863) 688-9000

February 27, 2013

This Part 2B Brochure Supplement augments the ADV Part 1A, and should be reviewed by you as one document to provide you with information about Allen & Company of Florida, Inc. and your financial adviser. If you did not receive Part 2A, or have any questions about this brochure, please contact Carol Zitzelberger (see above.)

**This brochure supplement provides information about the following Financial Advisers:**

**Lyonal Lindsey, Jr. and**

**Souri Vongvirat**

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## **Lyonal Lindsey, Jr.**

### **2. Educational Background and Business Experience**

Mr. Lindsey began his career with Allen & Company in 1985. He is a registered Financial Adviser. A Florida native born in 1947, Mr. Lindsey graduated from Florida State with a B.A. He is a Certified Wealth Strategist (CWS) that exam is administered by Cannon Financial Institute. A person with the CWS designation has received special training in the management and protection of assets and client interaction. He must take continuing education in order to maintain this designation.

### **3. Item Disciplinary Information**

Mr. Lindsey has no legal or disciplinary events presumed to be material

### **4. Other Business Activities**

Mr. Lindsey is not involved in any other business activities outside of Allen & Company

### **5. Additional Compensation**

Mr. Lindsey was recognized for his contribution to product sales, and he participated in Allen & Company's Annual Top Producers Conference.

### **6. Supervision**

Activity in accounts managed by Mr. Lindsey may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews

## **Souri Vongvirat**

### **2. Educational Background and Business Experience**

Ms. Vongvirat has been a Financial Adviser with Allen & Company since 2000, shortly after graduating from the University of Florida with a bachelor's degree in Finance. She was born in 1977. She obtained her Certified Wealth Strategist (CWS) certification that is administered by Cannon Financial Institute. A person with the CWS designation has received special training in the management and protection of assets and client interaction. Continuing education is required in order to maintain this designation.

### **3. Item Disciplinary Information**

Ms. Vongvirat has no legal or disciplinary events.

### **4. Other Business Activities**

Ms. Vongvirat is not involved in any other business activities outside of Allen & Company

### **5. Additional Compensation**

Ms. Vongvirat was recognized for her contribution to product sales, and she participated in

Allen & Company's Annual Top Producers Conference.

## **6. Supervision**

Activity in accounts managed by Ms. Vongvirat may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton President of Allen & Company performs those reviews; he may be reached at 863-688-9000.



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November 11, 2015

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**This brochure supplement provides information about the following Financial Adviser:**

**Stephen Arnold**

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## **Stephen Arnold**

### **2. Educational Background and Business Experience**

Stephen joined the Allen & Company team of advisers in 2015. He is currently registered with both a Series 7 (general securities) and Series 66 (investment adviser) license; both exams are offered through the Financial Industry Regulatory Authority, Inc. (FINRA). He is in the process of obtaining his Life, Health and Variable Annuities licenses.

Stephen has worked for more than twenty years in service-oriented industries. His achievements and recognition for his community service began as early as high school. Most recently, he worked in an orphanage in the Dominican Republic as a facilities manager. He provided lasting solutions that included developing a small farm and aquaponics system to help supplement the food needs of the orphanage.

Stephen is a fifth-generation Floridian. He graduated from Southeastern University with a degree in business. He lives in Lakeland with his wife and three children.

He was born in Florida in 1947 and graduated from Polk Jr. College. Roy later received his B.A. in Business Management from the University of South Florida.

### **3. Item Disciplinary Information**

Mr. Arnold has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Arnold is not involved in any other outside businesses.

### **5. Additional Compensation**

Mr. Arnold receives no outside compensation.

### **6. Supervision**

Activity in accounts managed by Mr. Arnold may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company, who may be reached at 863-688-9000, performs those reviews

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June 23, 2015

This Part 2B Brochure Supplement augments the ADV Part 1A, and should be reviewed by you as one document to provide you with information about Allen & Company of Florida, Inc. and your financial adviser. If you did not receive Part 2A, or have any questions about this brochure, please contact Carol Zitzelberger (see above.)

**This brochure supplement provides information about the following Financial Adviser:**

**Mabel Lopez**

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## **Mabel Lopez**

### **2. Educational Background and Business Experience**

Ms. Lopez has been a Financial Adviser with Allen & Company since October 2014. She was born in Cuba in 1979. She graduated in 2004 from the University of South Florida with a B.A. in Finance and a minor in Political Science. In July of 2005 she was employed by a department of the University of Florida as a fiscal assistant with budgeting and accounting duties and left in October of 2007. In December of 2007 she was employed by Scottrade, Inc. and left her position as a Senior Stock broker in October 2012 to raise a family. She worked part time from October 2013 until August 2014 for the Public Defenders' Office, 10<sup>th</sup> Judicial Circuit, in Bartow, as an interviewer.

### **3. Item Disciplinary Information**

Ms. Lopez has no legal or disciplinary events.

### **4. Other Business Activities**

Ms. Lopez is not involved in any other outside businesses.

### **5. Additional Compensation**

Ms. Lopez does not receive any outside compensation.

### **6. Supervision**

Activity in accounts managed by Ms. Lopez may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company, who may be reached at 863-688-9000, performs those reviews

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March 8, 2016

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**This brochure supplement provides information about the following Financial Adviser:**

**Troy L. Garcia**

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## **Troy L. Garcia**

### **2. Educational Background and Business Experience**

Mr. Garcia has worked with Allen & Company since May of 2007, he became a licensed investment adviser representative in 2011. Troy was born in 1984 in Lakeland, Florida. Prior to coming to Allen & Company he was a student and employee of the Bonefish Grill. He graduated in 2007 from Florida Southern College with a BS in Finance. Troy has also obtained his Certified Wealth Strategist Certification, "CWS." The CWS certification requires special training in the management and protection of assets and client interaction, and is conferred by Cannon Financial Institute. He is required to take continuing education to maintain this certification.

### **3. Item Disciplinary Information**

Mr. Garcia has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Garcia is a Board Member of Volunteers In Service to the Elderly ("VISTE"). He is not compensated for his time, his participation may take a few hours per month.

### **5. Additional Compensation**

Mr. Garcia does not receive any additional compensation.

### **6. Supervision**

Activity in accounts managed by Mr. Garcia may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company performs those reviews and may be reached at 863-688-9000.

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Phone: (863) 688-9000

March 8, 2016

**Locations Lakeland (above) and,  
Allen & Company of Florida, Inc. Viera Office  
7380 Murrell Road, Suite 100  
Viera, FL 32940**

This Part 2B Brochure Supplement augments the ADV Part 1A, and should be reviewed by you as one document to provide you with information about Allen & Company of Florida, Inc. and your financial adviser. If you did not receive Part 2A, or have any questions about this brochure, please contact Carol Zitzelberger (see above.)

**This brochure supplement provides information about the following Financial Adviser:**

**LAURA J. HAWLEY**

Ms. Hawley may be contacted at either our main office in Lakeland or,  
our branch office in Viera (above.)

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## **2. Educational Background and Business Experience**

Ms. Hawley is a Senior Vice-President and Financial Adviser with Allen & Company and has been with them since 1983. Ms. Hawley was born in 1961, she graduated from Florida Southern College with a B.S. in Finance. Laura is a Certified Financial Planner (CFP). The CFP designation is conferred by the Certified Financial Planner Board of Standards after passage of exams in finance, insurance, and employee benefits; tax, estate, and asset protection; as well as retirement planning and ethics. This certification requires ongoing training.

## **3. Item Disciplinary Information**

Ms. Hawley has no legal or disciplinary events.

## **4. Other Business Activities**

Ms. Hawley is a Vice-President and broker with Lemon Tree Real Estate. Since 2001 she is also associated with LJH Real Estate, LLC and LJH Investments, LLC. These activities are associated with her personal investments in real estate and are performed independent of Allen & Company. The income and time spent on these activities varies from year to year and she receives no commissions. She is also a partner in a real estate holding partnership (S. Florida Building Partnership) in Lakeland; this is an hour a month time commitment for which she is not compensated

Laura is also a volunteer Board Member with Lakeland Regional Medical Center, on the Board of the Florida Securities Dealer Association and Vice-Chairman of the Givewell Community Foundation of Greater Lakeland; she is not compensated for these activities.

## **5. Additional Compensation**

Ms. Hawley does not receive any additional compensation for her provision of advisory services for accounts.

## **6. Supervision**

Activity in accounts managed by Ms. Hawley may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews.



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February 27, 2013

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**This brochure supplement provides information about the following Financial Adviser:**

**Isaac B. Hartmann**

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## **Isaac Burke Hartmann**

### **2. Educational Background and Business Experience**

Mr. Hartmann has been a Financial Adviser employed with Allen & Company since 2004. He graduated from the University of Florida with a BS in Finance. Born in 1981 Isaac is a Certified Wealth Strategist (CWS) as well as a Certified Financial Planner (CFP.) The CWS required special training in the management and protection of assets and client interaction and is conferred by Cannon Financial Institute. The Certified Financial Planner Board of Standards confers the CFP designation after taking courses in finance, insurance, and employee benefits; tax, estate, and asset protection; as well as retirement planning and ethics. Both certifications require ongoing training.

### **3. Item Disciplinary Information**

Mr. Hartmann has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Hartmann is a non-working part owner (6%) in the Black & Brew Coffee House & Bistro, and a partner in Mulberry Ventures LLC, a means for personal investments in real estate. His involvement with both firms takes place outside of normal business hours at Allen & Company. His compensation varies.

### **5. Additional Compensation**

Mr. Hartman has been recognized for his contribution to product sales, and he participated in Allen & Company's Annual Top Producers Conference.

### **6. Supervision**

Activity in accounts managed by Mr. Hartmann may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews

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February 27, 2013

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**This brochure supplement provides information about the following Financial Adviser:**

**Andrew Hernan**

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## **Andrew Hernan**

### **2. Educational Background and Business Experience**

Mr. Hernan is a Financial Adviser and came to Allen & Company in 2009 after working for Genworth Financial, where he worked from 2006. Prior to that he worked for SunTrust Investment Services, Inc. where he began his career in the financial services industry in 1995. Andy was born in 1967 and attended Florida Southern College where he graduated in 1989 with a BS in Finance.

### **3. Item Disciplinary Information**

Mr. Hernan has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Hernan is President of Griffin Pools, Inc. and has been involved with Griffin since 2006. He earns a significant amount of his income from this activity.

### **5. Additional Compensation**

Other than what is noted above, Mr. Hernan does not receive any other income from outside sources.

### **6. Supervision**

Activity in accounts managed by Mr. Hernan may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews.

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March 8, 2016

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**This brochure supplement provides information about the following Financial Adviser:**

**Dana B. Hurley**

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## **Dana B. Hurley**

### **2. Educational Background and Business Experience**

Ms. Hurley joined Allen & Company in 2012, and is a financial adviser in our Lakeland office. She is currently registered with both a Series 7 (general securities) and Series 66 (investment adviser) license; both exams are offered through the Financial Industry Regulatory Authority, Inc. (FINRA.) Dana grew up and attended college in the Midwest, where she graduated with a B.S. Magna Cum Laude from Ferris State University; she also received a Master's Degree, Magna Cum Laude, from Ashland University. Dana relocated to Lakeland from Augusta, Georgia in 2010.

### **3. Item Disciplinary Information**

Ms. Hurley has no legal or disciplinary events.

### **4. Other Business Activities**

Ms. Hurley is actively involved in her Community of Lakeland, Florida. She is a Board Member of Junior Achievement, she is not compensated and spends about 1 ½ hours per month. She is also an uncompensated Board Member of the United Way of Central Florida, which involves about 1 hour per month. She is the Treasurer for the Emerge Lakeland Steering Committee, which takes about an hour a month. She also serves on the Charter Review Committee for the City of Lakeland; she is not compensated for this involvement, meeting and activities take a couple of hours a month. She participates in all of these activities outside of normal business hours.

### **5. Additional Compensation**

Ms. Hurley does not receive any additional compensation.

### **6. Supervision**

Activity in accounts managed by Ms. Hurley may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company performs those reviews and may be reached at 863-688-9000

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March 8, 2016

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**This brochure supplement provides information about the following Financial Adviser:**

**Chad Jones**

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## **Chad Jones**

### **2. Educational Background and Business Experience**

Chad Jones joined Allen & Company in 2012. He grew up in Plant City where he graduated from Plant City High School in 1992 and enlisted in the US Army one week after graduation when he was eighteen. He recently retired from active duty as a Major in the U.S. Army after 20 years of both enlisted and commissioned service. Chad's assignments included company command during Operation Iraqi Freedom and serving as the Finance and Accounting Officer to US Forces in Saudi Arabia.

Chad's military decorations include the Bronze Star Medal, the Meritorious Service Medal and Army Commendation Medal. While serving, he earned an MBA with Webster University after receiving his undergraduate business degree from the College of Charleston.

Mr. Jones has a Certified Financial Planner (CFP) designation. That designation is conferred by the Certified Financial Planner Board of Standards after completing courses in finance, insurance, employee benefits; tax, estate, and asset protection; and retirement planning and ethics. The CFP designation requires ongoing continuing education.

### **3. Item Disciplinary Information**

Mr. Jones has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Jones owns rental property, which he manages outside of business hours. He and his family attend and serve at Citrus Point Church in Tampa. Mr. Jones has authored "Raising A Money Smart Child" this is sold via a separate (personal) internet account.

### **5. Additional Compensation**

Mr. Jones does not receive any outside compensation.

### **6. Supervision**

Activity in accounts managed by Mr. Jones may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews.



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January 14, 2014

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**This brochure supplement provides information about the following Financial Adviser:**

**C. Glenn Leonard**

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## **C. Glenn Leonard**

### **2. Educational Background and Business Experience**

Mr. Leonard graduated from the University of Florida in 1976 with a B.A. in Advertising. He later went to Nova University where he obtained his J.D in 1980. He has both a Series 7 (general securities) and Series 66 (investment adviser) license; both exams are offered through the Financial Industry Regulatory Authority, Inc. (FINRA.) He has been a Real Estate Attorney for more than 30 years, and is a Real Estate Broker licensed with the State of Florida since 1980. A Florida native he was born in Ft. Lauderdale in 1954.

### **3. Item Disciplinary Information**

Mr. Leonard has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Leonard is President of Leonard and Morrison, P.A., and has worked full time at this professional association since 1981. He acts a trustee for approximately 5 to 8 trusts and charges a trustee fee. He is not involved in the management of trust assets as each trust has a professional advisor, which his clients select to manage their assets. His income from managing the trusts is less than \$10,000 per year.

### **5. Additional Compensation**

As President of Leonard and Morrison, P.A. where he has been for more than thirty years, he earns varying fees as an attorney. He is also a principal with 33 1/3% ownership of 1<sup>st</sup> Tile Insurance Company where he is compensated.

### **6. Supervision**

Mr. Leonard's activities are limited to referring clients in need of financial planning and asset management. He does so on a non-exclusive basis, with clients making the actual selection. Supervision and review of Mr. Leonard's activities is performed by Keith Albritton President of Allen & Company, he may be reached at 863-688-9000.

**Part 2B of Form ADV:**

**2. Brochure Supplement**

**ALLEN & COMPANY OF FLORIDA, INC.**  
A Registered Investment Adviser

IARD #25

1401 South Florida Avenue

Lakeland, FL 33803

<http://AllenInvestments.com>

Contact: Carol Zitzelberger [carolz@AllenInvestments.com](mailto:carolz@AllenInvestments.com)  
Phone: (863) 688-9000

February 27, 2013

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**This brochure supplement provides information about the following Financial Adviser:**

**Jack C. Lee**

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## **Jack C. Lee**

### **2. Educational Background and Business Experience**

Mr. Lee began his career in the financial services industry in 1982 with Merrill Lynch. In 2009 he became a Financial Adviser with Allen & Company. Jack graduated from the University of Maryland in 1966 with a BA, where he later also obtained a Masters in Economic Geography. He was born in 1937 in Virginia.

### **3. Item Disciplinary Information**

Mr. Lee has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Lee is not involved in any outside business activities.

### **5. Additional Compensation**

Mr. Lee receives no additional compensation.

### **6. Supervision**

Activity in accounts managed by Mr. Lee may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews

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February 27, 2013

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**This brochure supplement provides information about the following Financial Adviser:**

**Karin Day McKnight**

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## **Karin Day McKnight**

### **2. Educational Background and Business Experience**

Ms. McKnight has been a Financial Adviser with Allen & Company since 1992. She graduated from Florida Southern College with a B.S. in Business and Finance. Ms. McKnight was born in 1961.

### **3. Item Disciplinary Information**

Ms. McKnight has no legal or disciplinary events.

### **4. Other Business Activities**

Karin is an owner of K & J Properties, LLC, a rental property venture from which she receives income. She spends less than an hour a month on this activity.

### **5. Additional Compensation**

Ms. McKnight was recognized for her contribution to product sales, and participated in Allen & Company's Annual Top Producers Conference.

### **6. Supervision**

Activity in accounts managed by Ms. McKnight may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews.

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Phone: (863) 688-9000

November 11, 2015

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**This brochure supplement provides information about the following Financial Adviser:**

**Brad Stainsby**

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## **Brad Stainsby**

### **2. Educational Background and Business Experience**

A former 2002 Academic All American and former Polk County teacher, Mr. Stainsby has made excellence the mainstay of his career.

Brad earned his Bachelor's degree in Business from Florida Southern College in 2003. Along with his academic accomplishments, he was a member of Florida Southern's 2000 national championship golf team. Upon graduating, he taught math for ten years in the public school system. In addition to his academic teaching responsibilities he accepted a position of golf coach for the schools' team. He believes his teaching career has strengthened his capacity as a financial advisor.

Brad is a teacher at his core, and his goal is to help his clients understand, develop, and achieve their investment goals. Brad is currently registered with both a Series 7 (general securities) and Series 66 (investment adviser) license; both exams are offered through the Financial Industry Regulatory Authority, Inc. (FINRA.)

Brad enjoys spending time with his wife and four children. They are members of Lake Morton Community Church, where he serves on the Christian Education Committee and leads a small group.

### **3. Item Disciplinary Information**

Mr. Stainsby has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Stainsby does not participate in any outside business activities..

### **5. Additional Compensation**

Mr. Stainsby receives no outside compensation..

### **6. Supervision**

Activity in accounts managed by Mr. Stainsby may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews.



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February 27, 2013

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**This brochure supplement provides information about the following Financial Adviser:**

**Steven McTaggart**

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## **Steven McTaggart**

### **2. Educational Background and Business Experience**

Mr. McTaggart has been with Allen & Company since 2005 as a Financial Adviser. He previously worked for Merrill Lynch. He attended Santa Clara University where he graduated with a B.S. in Economics and a B.B.A. in Finance. Mr. McTaggart was born in 1970.

### **3. Item Disciplinary Information**

While he was at Merrill Lynch they received and reported a client complaint. Mr. McTaggart responded to this complaint the issue was closed without further action. Additional information can be found on the FINRA website.

### **4. Other Business Activities**

Mr. McTaggart is the owner of the DSZ Group, Inc. his compensation from this activity (rental income) varies, and may involve a couple of hours per month.

### **5. Additional Compensation**

Mr. McTaggart was recognized for his contribution to product sales, and participated in Allen & Company's Annual Top Producers Conference.

### **6. Supervision**

Activity in accounts managed by Mr. McTaggart may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews.

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July 16, 2014

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**This brochure supplement provides information about the following Financial Adviser located at:**

**Allen & Company of Florida, Inc. Winter Haven Office  
250 Avenue K, SW, Suite 106,  
Winter Haven, FL 33880**

**Lorin Bice**

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## **Lorin Bice**

### **2. Educational Background and Business Experience**

Mr. Bice began his career in the financial services industry in 2001, in 2004 Mr. Bice began working for Allen & Company as a Financial Adviser. He is presently the Branch Manager for the Winter Haven office. Mr. Bice was born in Florida in 1957, and graduated in 1980 from the University of Florida. He is a Certified Wealth Strategist (CWS) that exam is administered by Cannon Financial Institute. A person with the CWS designation has received special training in the management and protection of assets and client interaction. This certification requires ongoing certification to maintain.

### **3. Item Disciplinary Information**

Mr. Bice has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Bice is involved with Star Lake, Inc., a family real estate holding, which takes about an hour a month. He receives no compensation from this activity, and the company is not publically traded. He is also involved in the sale and purchase of artwork, for which he is compensated based upon the sale, he is involved in this activity outside of normal business hours, and spends several hours a month on this activity.

### **5. Additional Compensation**

Mr. Bice was recognized for his contribution to product sales, and he participated in Allen & Company's Annual Top Producers Conference.

### **6. Supervision**

Activity in accounts managed by Mr. Bice may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company performs those reviews; he may be reached at 863-688-9000.

**2B of Form ADV:**

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Phone: (863) 688-9000

February 27, 2013

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**This brochure supplement provides information about the following Financial Adviser located at:**

**Allen & Company of Florida, Inc. Winter Haven Office  
250 Avenue K, SW, Suite 106,  
Winter Haven, FL 33880**

**Diane Burr**

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## **Diane Burr**

### **2. Educational Background and Business Experience**

Ms. Burr began her career in the financial services industry in 1985. In 1985 Ms. Burr began working for Allen & Company as a Financial Adviser. Ms. Burr was born in Florida in 1951, and went to Haines City High School.

### **3. Item Disciplinary Information**

Ms. Burr has no legal or disciplinary events.

### **4. Other Business Activities**

Ms. Burr receives income from a mortgage note, and rental property. Ms. Burr is not involved in the day-to-day activities of collecting or managing (the) properties.

### **5. Additional Compensation**

Ms. Burr was recognized for her contribution to product sales, and she participated in Allen & Company's Annual Top Producers Conference.

### **6. Supervision**

Activity in accounts managed by Ms. Burr may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Lorin Bice, manager of the Winter Haven Office, who may be reached at 863-294-7411, performs those reviews.

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Phone: (863) 688-9000

March 8, 2016

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Advisers located at:**

**Allen & Company of Florida, Inc. Winter Haven Office  
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Winter Haven, FL 33880**

**Dana F. “Chip” Baxter, Jr.  
and  
John E. Campbell**

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## **Dana F. “Chip” Baxter, Jr.**

### **2. Educational Background and Business Experience**

In 1972 Mr. Baxter began his career with Allen & Company as a Financial Adviser. Originally from Ohio, Mr. Baxter was born in 1950. He graduated from the University of South Florida in 1972.

### **3. Item Disciplinary Information**

Mr. Baxter has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Baxter is an active partner in his family local orange grove the Family Farm Partnership. He works in this capacity outside of regular business hours for Allen & Company; his compensation varies from year to year.

### **5. Additional Compensation**

Mr. Baxter was recognized for his contribution to product sales, and he participated in Allen & Company’s Annual Top Producers Conference.

### **6. Supervision**

Activity in accounts managed by Mr. Baxter may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Lorin Bice, manager of the Winter Haven Office, who may be reached at 863-294-7411, performs those reviews.

## **John E. Campbell**

### **2. Educational Background and Business Experience**

Mr. Campbell began his career in the financial services industry in 1989. In 1994 he began working for Allen & Company. Born in 1955, he went to Manatee Junior College and attended Indiana University. John is a licensed Financial Adviser, and also received his Certified Wealth Strategist (CWS) designation that is administered by Cannon Financial Institute. A person with the CWS designation has received special training in the management and protection of assets and client interaction. This designation requires ongoing training to maintain the certification.

### **3. Item Disciplinary Information**

Mr. Campbell has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Campbell participates in 640 Broadway LLC, and 600 Yardhan LLC, rental property investments. He receives rental income from these activities and does not conducted these activities during trading hours.

### **5. Additional Compensation**



Mr. Campbell participated in Allen & Company's Annual Top Producers Conference, in recognition of his contributions to product sales.

## **6. Supervision**

Activity in accounts managed by Mr. Campbell may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Lorin Brice, Branch Office Manager performs those reviews and may be reached at 1 863 294-7411.

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February 27, 2013

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Winter Haven, FL 33880**

**Dana F. “Chip” Baxter, Jr.  
and  
Eric Greenhow**

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## **Dana F. “Chip” Baxter, Jr.**

### **2. Educational Background and Business Experience**

In 1972 Mr. Baxter began his career with Allen & Company as a Financial Adviser. Originally from Ohio, Mr. Baxter was born in 1950. He graduated from the University of South Florida in 1972.

### **3. Item Disciplinary Information**

Mr. Baxter has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Baxter is an active partner in his family local orange grove. He works in this capacity outside of regular business hours for Allen & Company; his compensation varies from year to year.

### **5. Additional Compensation**

Mr. Baxter was recognized for his contribution to product sales, and he participated in Allen & Company’s Annual Top Producers Conference.

### **6. Supervision**

Activity in accounts managed by Mr. Baxter may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Lorin Bice, manager of the Winter Haven Office, who may be reached at 863-294-7411, performs those reviews.

## **Eric Greenhow**

### **2. Educational Background and Business Experience**

Mr. Greenhow began his career in the financial services industry in 2002 and began to work for Allen & Company in 2003. Eric was born in 1981, and received both his BS in Finance and Masters Degree from the University of South Florida. He also obtained his Certified Financial Planner (CFP) designation that is conferred by the Certified Financial Planner Board of Standards after taking courses in finance, insurance, employee benefits; tax, estate, and asset protection; and retirement planning and ethics. The CFP designation requires ongoing continuing education.

### **3. Item Disciplinary Information**

Mr. Greenhow has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Greenhow has been a partner of the Florida Investment Group, LLC since June of 2009; it is located in Lakeland. He is also a partner of RentPolkCount.Com. LLC, and Grade Investments, LLC. These businesses manage rental property, and are not investment related. Compensation for them is based upon net income realized from the rentals. These

ventures take about 4 to 5 hours of his time per month and are conducted outside of business hours at Allen & Company.

He is also on the Board of the Polk State College Foundation, an activity that takes about an hour a month, is not investment related and located in Winter Haven, Florida. He is not compensated for his time.

#### **5. Additional Compensation**

Mr. Greenhow was recognized for his contribution to product sales, and he participated in Allen & Company's Annual Top Producers Conference.

#### **6. Supervision**

Activity in accounts managed by Mr. Greenhow may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Lorin Bice, manager of the Winter Haven Office, who may be reached at 863-294-7411, performs those reviews.

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March 8, 2016

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**Kyle Cobia**

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**Kyle Cobia**

**2. Educational Background and Business Experience**

Kyle Cobia joined the Allen & Company team in 2012. He grew up in Lakeland and was born in 1981. He attended the University of Miami where he graduated with a B.A. in Business Management. He was a member of the Miami Hurricanes football team and played in the Sugar, Fiesta, Orange, and Rose Bowls. In addition to winning two state championships in high school and a national championship in college, he also excels in business. Prior to Allen & Company, Kyle spent 6 years as a financial analyst at Armor Correctional Health, where he specialized in finance and budgeting. Kyle began with Armor at its inception and helped them grow into a 1000+ employee multi-million dollar a year company.

Kyle uses his experience as a financial analyst to review retirement and savings accounts for large net worth clients. Kyle brings passion and knowledge for personal finance to help clients set and achieve goals. His down to earth approach lends itself to all. He has a gift in explaining complex financial issues with easy to understand terminology. Kyle is currently registered with both a Series 7 (general securities) and Series 66 (investment adviser) license; both exams are offered through the Financial Industry Regulatory Authority, Inc. (FINRA.) He is currently taking the course work required to earn a Certified Financial Planner Designation™.

### **3. Item Disciplinary Information:**

Mr. Cobia has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Cobia is involved in several outside activities, none of which are related to his employment with Allen & Company. Kyle is a family man who loves God, his wife, child and his financial profession. He attends Grace Lutheran Church in Winter Haven where he is a part of the Fellowship Committee and the Financial Aid Committee. He supports non-profit organizations including Food for the Hungry, and Junior Achievement.

### **5. Additional Compensation**

Mr. Cobia does not receive any additional compensation.

### **6. Supervision**

Activity in accounts managed by Mr. Cobia may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Lorin Brice, Branch Office Manager performs those reviews and may be reached at 1 863 294-7411.

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March 8, 2016

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Winter Haven, FL 33880**

**Christopher “Casey” Floyd**

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## **Christopher “Casey” Floyd**

### **2. Educational Background and Business Experience**

Mr. Floyd joined the Allen & Company team in 2015 as a Financial Advisor in our Winter Haven Office. He is currently registered with both a Series 7 (general securities) and Series 66 (investment advisor) license; both exams are offered through the Financial Industry Regulatory Authority, Inc. (FINRA). Casey grew up in Lake Wales, Florida and attended college in Babson Park, Florida, where he earned in B.S. Cum Laude from Webber International University. He is a life-long resident of Polk County and currently resides in Winter Haven Florida with this wife and three children. .

### **3. Item Disciplinary Information**

Mr. Floyd has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Floyd is not involved in any other outside businesses.

### **5. Additional Compensation**

Mr. Floyd does not receive any outside compensation.

### **6. Supervision**

Activity in accounts managed by Mr. Floyd may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Lorin Brice, Branch Office Manager performs those reviews and may be reached at 1 863 294-7411.

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February 27, 2013

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Winter Haven, FL 33880**

**Sharon Pettit**

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## **Sharon Pettit**

### **2. Educational Background and Business Experience**

Ms. Pettit joined Allen & Company in 1968. She was born in 1939 and went on to attend Florida State University. She is a registered Financial Adviser and has served as a FINRA arbitrator. Sharon has also attended the Wharton School, University of Pennsylvania. She is an accredited Certified Financial Planner (CFP.) The CFP designation is conferred by the Certified Financial Planner Board of Standards after taking and passing exams in multiple areas such as: finance, insurance, and employee benefits; tax, estate, and asset protection; as well as retirement planning and ethics. This certification requires continuing training to maintain.

### **3. Item Disciplinary Information**

Ms. Pettit has no legal or disciplinary events.

### **4. Other Business Activities**

Ms. Pettit is not involved in any outside business activities.

### **5. Additional Compensation**

Ms. Pettit does not receive any additional compensation.

### **6. Supervision**

Activity in accounts managed by Ms. Pettit may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Lorin Bice, manager of the Winter Haven Office, who may be reached at 863-294-7411, performs those reviews.

**Part 2B of Form ADV:**

**1. Brochure Supplement**

**ALLEN & COMPANY OF FLORIDA, INC.**

A Registered Investment Adviser

IARD #25

1401 South Florida Avenue

Lakeland, FL 33803

<http://AllenInvestments.com>

Contact: Carol Zitzelberger [carolz@AllenInvestments.com](mailto:carolz@AllenInvestments.com)

Phone: (863) 688-9000

February 18, 2015

This Part 2B Brochure Supplement augments the ADV Part 1A, and should be reviewed by you as one document to provide you with information about Allen & Company of Florida, Inc. and your financial adviser. If you did not receive Part 2A, or have any questions about this brochure, please contact Carol Zitzelberger (see above.)

This brochure supplement provides information about the following Financial Adviser who is located at:

**Allen & Company of Florida, Inc. Viera Office**  
**7380 Murrell Road, Suite 100**  
**Viera, FL 32940**

**Michael G. Foster**

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## **Michael G. Foster**

### **2. Educational Background and Business Experience**

Mr. Foster joined Allen & Company in 2013. He is a graduate of Westfield College, where he earned a Bachelor of Science Degree in Finance/Business Management. He was born in 1965, and has more than 19 years of experience in the financial services industry, working for Suntrust Investment Services, Inc., BB&T Investment Services, Inc. and CUSO Financial Services, L.P. where he was an Advisor Representative and Consultant to individuals, businesses and non-profit organizations. Michael currently holds FINRA Series 7, 63 and 65 licenses, in addition he also holds Life, Health and Variable Annuity insurance licenses in the State of Florida.

### **3. Item Disciplinary Information**

Mr. Foster has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Foster is not involved in any outside business activities.

### **5. Additional Compensation**

Mr. Foster does not receive any additional compensation.

### **6. Supervision**

Activity in accounts managed by Mr. Foster may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Mr. Terry Tolbert, Branch Manager and Vice-President of Allen & Company performs these reviews and may be reached at 321-253-3131.

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**Contact: Carol Zitzelberger [carolz@AllenInvestments.com](mailto:carolz@AllenInvestments.com)**

**Phone: (863) 688-9000**

**March 8, 2016**

**Locations Lakeland (above) and,  
Allen & Company of Florida, Inc. Viera Office  
7380 Murrell Road, Suite 100  
Viera, FL 32940**

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**This brochure supplement provides information about the following Financial Adviser:**

**LAURA J. HAWLEY**

**Ms. Hawley may be contacted at either our main office in Lakeland or,  
our branch office in Viera (above.)**

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## **2. Educational Background and Business Experience**

Ms. Hawley is a Senior Vice-President and Financial Adviser with Allen & Company and has been with them since 1983. Ms. Hawley was born in 1961, she graduated from Florida Southern College with a B.S. in Finance. Laura is a Certified Financial Planner (CFP). The CFP designation is conferred by the Certified Financial Planner Board of Standards after passage of exams in finance, insurance, and employee benefits; tax, estate, and asset protection; as well as retirement planning and ethics. This certification requires ongoing training.

## **3. Item Disciplinary Information**

Ms. Hawley has no legal or disciplinary events.

## **4. Other Business Activities**

Ms. Hawley is a Vice-President and broker with Lemon Tree Real Estate. Since 2001 she is also associated with LJH Real Estate, LLC and LJH Investments, LLC. These activities are associated with her personal investments in real estate and are performed independent of Allen & Company. The income and time spent on these activities varies from year to year and she receives no commissions. She is also a partner in a real estate holding partnership (S. Florida Building Partnership) in Lakeland; this is an hour a month time commitment for which she is not compensated

Laura is also a volunteer Board Member with Lakeland Regional Medical Center, on the Board of the Florida Securities Dealer Association and Vice-Chairman of the Givewell Community Foundation of Greater Lakeland; she is not compensated for these activities.

## **5. Additional Compensation**

Ms. Hawley does not receive any additional compensation for her provision of advisory services for accounts.

## **6. Supervision**

Activity in accounts managed by Ms. Hawley may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Keith Albritton, President of Allen & Company who may be reached at 863-688-9000, performs those reviews.

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Lakeland, FL 33803

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Contact: Carol Zitzelberger [carolz@AllenInvestments.com](mailto:carolz@AllenInvestments.com)

Phone: (863) 688-9000

February 25, 2013

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This brochure supplement provides information about the following Financial Adviser located at:

Allen & Company of Florida, Inc. Viera Office  
7380 Murrell Road, Suite 100  
Viera, FL 32940

**Thomas Alan Bixby**

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## **Thomas Alan Bixby**

### **2. Educational Background and Business Experience**

Mr. Bixby joined Allen & Company in February of 2013 and serves as a Vice President of Investments in our Viera Branch Location. Born in 1960 he graduated with a Bachelor of Arts Degree in Business from Florida State University. Tom began his financial career in 1983 working with E. F. Hutton. He also worked for Merrill Lynch, Piece, Fenner & Smith. He has been a wealth management adviser for the last thirty years, and was employed in this capacity by Morgan Stanley for the fifteen-year period prior to his joining Allen & Company.

He is a Certified Financial Planner (CFP), which requires continuing education. The Certified Financial Planner Board of Standards confers the CFP designation after taking courses in finance, insurance, and employee benefits; tax, estate, and asset protection; as well as retirement planning and ethics. He is currently registered with several securities licenses, including a Series 7 (general securities) and Series 65 (investment adviser) license; both exams are offered through the Financial Industry Regulatory Authority, Inc. (FINRA.) He also is licensed by the State of Florida for Life, Health and Variable Annuity insurance products. Tom currently resides in Suntree with his wife Tina .

### **3. Item Disciplinary Information**

Mr. Bixby has no legal or disciplinary events.

### **4. Other Business Activities**

Mr. Bixby is not involved in any other outside businesses for compensation.

### **5. Additional Compensation**

Mr. Bixby does not receive any additional compensation.

### **6. Supervision**

Activity in accounts managed by Mr. Bixby may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Mr. Terry Tolbert, Vice-President and Branch Office Manager performs these reviews and may be reached at 321 253-3131



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March 30, 2013

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**7380 Murrell Road, Suite 100**  
**Viera, FL 32940**

**William August Slover, Jr.**

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## **William August Slover, Jr.**

### **2. Educational Background and Business Experience**

Mr. Slover started his career in financial services in 1986 with Blinder Robinson, he left them in 1987 to work for UBS Financial Services. After working for UBS for seventeen years he worked for Merrill Lynch, Pierce, Fenner & Smith and left to join us at Allen & Company in September of 2012. William has a AAS/AS in Criminal Justice from S.U.N.Y. Born in 1957, Mr. Slover is currently registered with a Series 7 (general securities) Series 65 (investment adviser) and Series 63 Uniform Securities Agent State Law Exam, these licenses are offered through the Financial Industry Regulatory Authority, Inc. (FINRA.) He also is a Chartered Retirement Planning Counselor (CRPC), which requires biennial re-certification through the College for Financial Planning. The course of study for a CRPC included analysis and application of various vehicles for retirement accounts.

### **3. Item Disciplinary Information**

Mr. Slover does not have any disciplinary actions to report.

### **4. Other Business Activities**

Mr. Slover receives compensation from a rental apartment.

### **5. Additional Compensation**

Mr. Slover does not receive any additional compensation for his provision of advisory services for accounts with Allen & Company. Mr. Slover is a Solicitor for ePlan, an unaffiliated company and Registered Investment Adviser; ePlan administers and manages employee benefit funds. See the separate disclosure for information about the Solicitors fee if you are considering this product.

### **6. Supervision**

Activity in accounts managed by Mr. Slover may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Mr. Terry Tolbert, Vice President and Branch Office Manager performs those reviews and may be reached at 321 253-3131.

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February 18, 2015

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This brochure supplement provides information about the following Financial Adviser located at:

**Allen & Company of Florida, Inc. Viera Office**  
7380 Murrell Road, Suite 100  
Viera, FL 32940

**Terry L Tolbert**

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**Terry L. Tolbert**

**2. Educational Background and Business Experience**

Terry Tolbert joined Allen & Company in 2012 and serves as Vice President of Investments. Terry graduated with a Bachelor of Arts Degree from Methodist University and has a Masters of Education from Stetson University. He was born in 1960. He is a Certified Financial Planner (CFP) and a Chartered Retirement Planning Counselor (CRPC.) He obtained both designations from the College of Financial Planning, these designations are conferred by the Certified Financial Planner Board of Standards after passage of exams in finance, insurance, and employee benefits; tax, estate, and asset protection; as well as retirement planning and ethics. These certifications require ongoing training. In addition to holding his securities licenses he is also licensed in Life, Health and Variable Annuities, which also require continuing education. These allow him to represent an insurer on life and annuity contracts, and a health maintenance organizations.

### **3. Item Disciplinary Information**

Mr. Tolbert does not have any disciplinary actions to report.

### **4. Other Business Activities**

Mr. Tolbert is not involved in any business activities for compensation. He has been a volunteer for a number of Brevard County organizations, including: the City of Titusville Police & Fire Pension Board, Mims Little League, Habitat for Humanity, Kiwanis and the YMCA.

### **5. Additional Compensation**

Mr. Tolbert does not receive any additional compensation for his provision of advisory services for accounts.

### **6. Supervision**

Activity in accounts managed by Mr. Tolbert may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. Mr. Keith Albritton, President of Allen & Company performs those reviews and may be reached at 863-688-9000.