

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>

Contact: Carol Zitzelberger carolz@AllenInvestments.com

Phone: (863) 688-9000

March 7, 2011

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. 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

2. MATERIAL CHANGES

Our last Brochure was dated August 23, 2010. We have not had any material changes to that document.

This document addresses a new written text format implemented by the Securities and Exchange Commission; although different in appearance and description, the only item that has changed from our prior disclosure is our total assets under management.

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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. 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 depend 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 February 25, 2011 our non-discretionary assets under management totaled \$1,647,004,560.00

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.

Allocation Advisor Program Fees

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

Minimum Account Size is \$25,000

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

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
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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

Fixed Account Fees:

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

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 you 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 addition 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.

C. 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 Wachovia.

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, accounts are selected on a random basis and receive a review from your financial advisers supervisor at least once a year. We also have personnel from our supervisory staff randomly select accounts and review accounts based upon exception reports (factors which note activity or performance that was unexpected.) This is done on a routine basis.

14. CLIENT REFERRALS and OTHER COMPENSATION

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.

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. You will receive all proxies from your custodian, directly from the company, or the transfer agent. You may receive these electronically as well. If you wish to discuss the matters contained in the 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

Phone: (863) 688-9000

March 7, 2011

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 Group

**Ralph Carter Allen,
Keith E. Albritton, and
Virginia "Ginny" Allen Houghton**

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Ralph Carter Allen

2. Educational Background and Business Experience

Mr. Allen has been at the helm of 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 Specialist (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 legal or disciplinary events that are presumed to be material.

4. Other Business Activities

Mr. Allen is a limited partner of Odyssey Operating Partnership, Ltd, and on the Board of Directors of Odyssey Advisor, LLC, which was formed in 2004. He is not compensated for his duties by Odyssey and the time spent on this activity is not substantial.

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 Wealthy Specialist (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 involved along with several partners in ADJS, L.L.C. that was formed in 2006 for the purpose of personal and commercial real estate acquisitions. His compensation for this activity varies and it takes up a limited amount of Mr. Albritton's time.

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 and is the newest member of the Allen Albritton Group. 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 Specialist (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 does not participate in any outside business activities.

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.

Part 2B of Form ADV:

1. Brochure Supplement

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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 has no legal or disciplinary events.

4. Other Business Activities

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

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

A. 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 has no legal or disciplinary events presumed to be material

4. Other Business Activities

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

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 Martoz

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 has no legal or disciplinary events.

4. Other Business Activities

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

5. Additional Compensation

Ms. Marotz does not receive any additional compensation bonuses based upon his 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 other business activities outside of Allen & Company

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>

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

March 7, 2011

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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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This brochure supplement provides information about the following Financial Advisers:

Roy Ferron Edwards

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Roy Ferron Edwards

2. Educational Background and Business Experience

Mr. Edwards, has been a Financial Adviser working with Allen & Company since 2002. 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. Edwards has no legal or disciplinary events.

4. Other Business Activities

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

5. Additional Compensation

Mr. Edwards 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. Edwards 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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This brochure supplement provides information about the following Financial Advisers:

Kurt Elmhurst

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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 Specialist (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 business 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.

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This brochure supplement provides information about the following Financial Advisers:

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 Specialist (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 in the Black & Brew Coffee Shop, 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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This brochure supplement provides information about the following Financial Advisers:

LAURA J. HAWLEY

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Laura J. Hawley

2. Educational Background and Business Experience

Ms. Hawley is a 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. Laura is also a volunteer Board Member with Lakeland Regional Medical Center, for which she is not compensated.

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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This brochure supplement provides information about the following Financial Advisers:

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 has been Vice-President and general partner of Griffin Pools, Inc. 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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This brochure supplement provides information about the following Financial Advisers:

Jon Fred Larson

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Jon Fred Larson

2. Educational Background and Business Experience

Mr. Larson began his career with Allen & Company in 2002 as a Financial Adviser. He has a B.A. from the University of Maryland, and is a 1992 graduate of the American Banker Association National Graduate Trust School. The curriculum for the Trust accreditation includes account administration, fiduciary law, tax and estate planning, investment management and personal financial planning. Mr. Larson is also an Enrolled Agent "EA" IRS, which is a tax professional that has demonstrated special competence in federal tax matters and may represent clients on such matters before the IRS. He was born in 1948.

3. Item Disciplinary Information:

Mr. Larson has reportable disciplinary events including in 2005 Chapter 13 bankruptcy protecting a residential mortgage, and several incidents for overdrafts that he made reparation for and were not pursued. Additional information can be reviewed at:

[http://www.adviserinfo.sec.gov/\(S\(z0fcrx45t2rskp55c5bppu45\)\)/IAPD/Content/Search/iapd_Search.aspx](http://www.adviserinfo.sec.gov/(S(z0fcrx45t2rskp55c5bppu45))/IAPD/Content/Search/iapd_Search.aspx). Select IAR and enter Jon Larson, CRD 861915. Click "detailed report" at the top right to see these disclosures.

4. Other Business Activities

Mr. Larson is an Enrolled Agent, as noted above.

5. Additional Compensation

At the current time Mr. Larson is not receiving any significant compensation for his work as an EA, which is outside of the scope of his employment with Allen & Company.

6. Supervision

Activity in accounts managed by Mr. Larson 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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This brochure supplement provides information about the following Financial Advisers:

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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This brochure supplement provides information about the following Financial Advisers:

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 University 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 holds a volunteer position with the City of Lakeland called a "Utility Commissioner"; her community involvement takes several hours a month. She is not involved in any investment related outside activities and does not receive any compensation from outside sources.

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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This brochure supplement provides information about the following Financial Advisers:

Steven McTaggart

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Steve 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. Steve is a Certified Wealth Specialist (CWS). The CWS required special training in the management and protection of assets and client interaction and requires ongoing training.

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. Details can be reviewed on line at:

[http://www.adviserinfo.sec.gov/\(S\(z0fcrx45t2rskp55c5bppu45\)\)/IAPD/Content/Search/iapd_Search.aspx](http://www.adviserinfo.sec.gov/(S(z0fcrx45t2rskp55c5bppu45))/IAPD/Content/Search/iapd_Search.aspx). Select IAR and enter Steve McTaggart, CRD 4848857. Click "detailed report" at the top right to see these disclosures.

4. Other Business Activities

Mr. McTaggart is the owner of the DSZ Group, which is not an investment related activity. He does not receive income from this, nor does he spend any appreciable amount of time on it.

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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This brochure supplement provides information about the following Financial Advisers:

William “Ed” Rumph, III

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William “Ed” Rumph, III

2. Educational Background and Business Experience

Mr. Rumph joined Allen & Company in 1994. He attended Georgia Southern College, where he graduated with a BS major in Business Marketing. Mr. Rumph was born in 1949. Ed is a Certified Wealth Specialist (CWS). The CWS requires special training in the management, protection and growth of client assets and is earned through Cannon Financial Institute. Continuing education is required to maintain this designation.

3. Item Disciplinary Information:

Mr. Rumph has no legal or disciplinary events.

4. Other Business Activities

Mr. Rumph is involved in several outside activities, none of which are related to his employment with Allen & Company. He is the Director of Market Capital Corporation, the President of WER Investments, Inc. and is a Partner in the Saluda Road Partnership LLP. These are personal endeavors and do not involve a significant amount of time and his compensation will vary.

5. Additional Compensation

Mr. Rumph 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. Rumph 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 can be reached at 863-688-9000, performs those reviews.

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

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

Diane Burr and Lorin Bice

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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. In addition to having her securities licenses, Diane received her 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. She must take continuing education in order to maintain this designation.

3. Item Disciplinary Information:

Ms. Burr has no legal or disciplinary events.

4. Other Business Activities

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

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. John E. Campbell, manager of the Winter Haven Office, who may be reached at 863-394-7411, performs those reviews.

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

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. John E. Campbell manager of the Winter Haven Office performs those reviews; he may be reached at 863-394-7411.

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

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

The Campbell, Baxter, Greenhow Group

**Dana F. "Chip" Baxter, Jr.
John E. Campbell, 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. Chip 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. 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. John E. Campbell, manager of the Winter Haven Office, who may be reached at 863-394-7411, 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 is not involved in any other business activities outside of Allen & Company

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 Ms. Burr 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.

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. He also is a Certified Wealth Specialist (CWS), which focuses on studies in the management and protection of assets and is conferred by Cannon Financial Institute. Both certifications require that he take continuing education.

3. Item Disciplinary Information:

Mr. Greenhow has no legal or disciplinary events.

4. Other Business Activities

Mr. Greenhow is a partner of the Florida Investment Group, LLC, that is not investment related, and is a property management company. This takes up a very limited amount of his time and this activity is conducted outside of business hours at Allen & Company

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. John E. Campbell, manager of the Winter Haven Office, who may be reached at 863-394-7411, 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

Phone: (863) 688-9000

March 7, 2011

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(s) located at:

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

David Hamre

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David Hamre

2. Educational Background and Business Experience

In 1960 Mr. Hamre began working for Thrivent Financial, and left in 2007 to work for Allen & Company in 2007. He was born in 1938, and received a BA from St. Olaf's College in both economics and religion. In addition to his securities licenses, David is a Certified Financial Planner (CFP) that designation is conferred by the Certified Financial Planner Board of Standards after taking courses in finance, insurance, employee benefits; tax, estate, and asset protection; retirement planning and ethics. The certification requires ongoing training.

3. Item Disciplinary Information:

Mr. Hamre has no legal or disciplinary events.

4. Other Business Activities

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

5. Additional Compensation

Mr. Hamre does not receive any additional compensation.

6. Supervision

Activity in accounts managed by Mr. Hamre may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. John E. Campbell, manager of the Winter Haven Office, who may be reached at 863-394-7411, performs those reviews.

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Winter Haven, FL 33880**

Clayton "Clay" McKown

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Clay McKown

2. Educational Background and Business Experience

Mr. McKown joined Allen & Company in 2007 as a Client Service Associate, in 2008 after passing the requisite licenses, he became a Financial Adviser. Prior to working for Allen & Company he was a student and worked for Publix as a Cashier. Born in 1986, Clay graduated from South Florida Community College and in 2008 obtained his Bachelor's degree from the University of South Florida. In 2009 he completed and passed the Certified Financial Planner (CFP) exam, and is presently waiting for certification pending completion of the requisite work experience. The CFP designation is conferred the Certified Financial Planner Board of Standards and studies included courses in finance, insurance, and employee benefits; tax, estate, and asset protection; and retirement planning and ethics. This certification requires ongoing training.

3. Item Disciplinary Information:

Mr. McKown has no legal or disciplinary events.

4. Other Business Activities

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

5. Additional Compensation

Mr. McKown does not receive any additional compensation.

6. Supervision

Activity in accounts managed by Mr. McKown may be reviewed on an annual or quarterly basis for conformance to the investment objectives stated by the client. John E. Campbell, manager of the Winter Haven Office, who may be reached at 863-394-7411, performs those reviews.

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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. John E. Campbell, manager of the Winter Haven Office, who may be reached at 863-394-7411, performs those reviews.