

Mutual Trust Asset Management, Inc.

Form ADV Part 2B Brochure Supplement

Cover Page

Name of Supervised Person/IA Rep	Jed Bandes, CFP®
Date of Last Revision	March 2020

Name of Registered Investment Advisor	Mutual Trust Asset Management, Inc. (MTAM)
Address	2963 Gulf to Bay Blvd, Suite 330
Phone Number	(727) 799-9922
Website Address	None

This Brochure Supplement provides information about Jed Bandes, CFP® that supplements the Mutual Trust Asset Management, Inc brochure. You should have received a copy of that brochure. Please contact Jed, if you did not receive Mutual Trust Asset Management, Inc's brochure or if you have any questions about the contents of this supplement. Additional information about Jed is available on the SEC's website at: www.adviserinfo.sec.gov (Jed's CRD # 722806)

I read, received and understand Form ADV.

Client Name

Date

Client Name

Date

Educational Background and Business Experience

Education and Business Background

Name: Jed E. Bandes, CFP®

Year of Birth: 1954

Education: Florida State University
BA Finance, 1980

Business: Mutual Trust Asset Management, Inc., Registered Investment Advisory Firm - Clearwater, FL, Owner, President, Investment Adviser Representative
09/2002 - Present

Mutual Trust Asset Management, Inc., Non-Investment Related - Clearwater, FL, Owner, President, 1985 - 08/2002

Mutual Trust Company of America Securities, Brokerage Firm Clearwater, FL, Owner, President, Registered Representative
1986-Present

Industry: Member of Financial Industry Regulatory Authority (FINRA) District 7, District Business Conduct Committee 2007-2010
Member, Financial Industry Regulatory Authority (FINRA) Board of Governors
2010 - 2013

Professional Designations Qualifications

CFP®, Certified Financial Planner

CLU, Chartered Life Underwriter

ChFC, Chartered Financial Consultant

Financial Industry Regulatory Authority (FINRA) Licenses

FINRA Series 4	Registered Options Principal	02/86
FINRA Series 7	General Securities Representative	02/86
FINRA Series 24	General Securities Principal	02/86
FINRA Series 28	Introducing Broker/Dealer Financial and Operations Principal	04/91
FINRA Series 53	Municipal Securities Principal	04/86
FINRA Series 63	Uniform Securities Agent State Law	03/81
FINRA Series 79	Limited Representative – Investment Banking	01/10
FINRA Series 99	Operations Professional	10/11

Life, Health & Variable Annuities	03/88
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Please see below for the descriptions of the Designations/Examinations

Disciplinary Information

Supervised persons are required to report on Form ADV Part 2 B, if there are any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person and disclose all material facts regarding those events. Jed Bandes has nothing to report.

Other Business Activities

Jed Bandes is in the business of selling securities and insurance. These business activities represent approximately 90% of time and income.

Jed Bandes is associated with Mutual Trust Company of America Securities, Inc. as a Registered Representative, Registered Principal, Registered Options Principal, Introducing Broker/Dealer Financial Operations Principal, and Municipal Securities Principal. He may recommend securities offered by Mutual Trust Company of America Securities, Inc. or its affiliates. If clients purchase these products through him, he will receive the normal commissions or fees. Thus, a conflict exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through Mutual Trust Asset Management, Inc. or through Mutual Trust Company of America Securities, Inc.

Jed Bandes is licensed with several life, health, and variable annuity insurance companies. Insurance products offered by these companies may be recommended. If clients purchase these products through him, he will receive the normal commissions. Thus, a conflict of interest exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through MTAM or through these insurance companies. We seek to mitigate any conflict by making recommendations in the best interest of the client.

Additional Compensation

(Please refer to the conflicts associated with the Additional Compensation in the section above titled Other Business Activities)

As a Registered Representative of Mutual Trust Company of America Securities, Inc. Jed will be compensated for effecting securities transactions on the normal commission schedule.

When appropriate Jed Bandes will recommend various individual equity and fixed income securities, including options for which he will receive commissions.

When appropriate Jed Bandes will recommend mutual funds or variable annuities that pay commissions (including 12(b)-1 fees or other compensation) from the respective product sponsor. All allowable compensation is disclosed in the prospectus.

When appropriate Jed Bandes will recommend insurance policies that pay commissions from the respective insurance companies.

The above additional compensation represents a conflict of interest. MTAM Code of Ethics and internal policies require all recommendations place the interest of the client first. Accounts are reviewed on a regular basis to ensure compliance with the Code of Ethics and conflict of interest policies.

Supervision

Jed Bandes formulates his own investment advice. Jed, as Owner and Chief Compliance Officer, monitors portfolios for investment objectives and other supervisory reviews and is responsible for all advice provided to clients. Jed may be contacted at the phone number of the main office as shown on the cover page.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

CLU, Chartered Life Underwriter – A Chartered Life Underwriter has earned the premier credential in the insurance profession, representing eight or more comprehensive college-level courses covering all aspects of insurance planning, estate and retirement issues, taxation business insurance, and risk

management. For more than 80-years consumers have trusted this mark, which is conferred by the American College, a non-profit educator with the highest level of accreditation.

The average study time for the program is over 400 hours and can take years to earn. Each CLU must also complete a minimum of 30 hours of continuing education every two years, adhere to strict ethical standards, and meet extensive experience requirements, ensuring the knowledge you're counting on is both comprehensive and current.

ChFC, Chartered Financial Consultant - Is the "Advanced Financial Planning" designation awarded by The American College of Financial Services. Charter holders use the designation ChFC on their resumes and are qualified to provide comprehensive advanced financial planning for individuals, professionals, and small business owners. The authority to use the ChFC mark is granted by the Certification Committee of the Board of Trustees of The American College and is contingent on adherence to a set of ethical guidelines. According to the American College, "[a]ll ChFC advisors are required to do the same for clients that they would do for themselves in similar circumstances, the standard of ethical behavior most beneficial for their clients." Since 1982, approximately 40,000 people have earned the ChFC through regionally accredited program courses and exams. Successful completion of the ChFC qualifies designees to register as an Investment Adviser Representative (IAR) with FINRA without sitting for the Series 65 examination.

FINRA Series 4 Registered Options Principal

The Series 4 exam — the Registered Options Principal Qualification Exam (OP) — assesses the competency of an entry-level principal to perform their job as a registered options principal. The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of a registered options principal, including the rules and statutory provisions applicable to the supervisory management of a firm's options personnel, accounts and trading, as well as exchange rules and regulations applicable to the trading of options contracts. In addition to the Series 4 exam, candidates must pass the [Securities Industry Essentials \(SIE\) Exam](#) and the [General Securities Representative Exam \(Series 7\)](#) to hold the Registered Options Principal registration. For more information about the Series 4 exam, refer to [FINRA Rule 1210](#) and [FINRA Rule 1220\(a\)\(8\)](#).

FINRA Series 7 General Securities Representative Examination

The Series 7 exam — the General Securities Representative Qualification Examination (GS) assesses the competency of an entry-level registered representative to perform their job as a general securities representative.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of a general securities representative, including sales of corporate securities, municipal securities, investment company securities, variable annuities, direct participation programs, options and government securities.

Candidates must pass the Securities Industry Essentials (SIE) exam and the Series 7 exam to obtain the General Securities Representative registration. For more information about the SIE and Series 7 exams, refer to FINRA Rule 1210 and FINRA Rule 1220(b)(2).

FINRA Series 24 General Securities Principal

The Series 24 exam — the General Securities Principal Qualification Exam (GP) — assesses the competency of an entry-level principal to perform their job as a principal dependent on their corequisite registrations.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of a principal, including the rules and statutory provisions applicable to the supervisory management of a general securities broker-dealer.

In addition to the Series 24 exam, candidates must pass the [Securities Industry Essentials \(SIE\) Exam](#) and a representative-level qualification exam, or the Supervisory Analysts Exam ([Series 16](#)) exam, to hold an appropriate principal registration. Based on their corequisite qualification(s), candidates will receive the following principal registration(s) upon passing the Series 24 exam:

Corequisite Exam(s)	Principal Registrations
SIE + Series 7	General Securities Principal (GP)
SIE + Series 57	Trader Principal (TP)
SIE + Series 79	Investment Banking Principal (BP)
SIE + Series 82	Private Securities Offerings Principal (PO)
SIE + Series 86 and 87	Research Principal (RP)
Series 16	Research Principal (RP)

For more information about the Series 24 exam, refer to [FINRA Rule 1210](#) and [FINRA Rule 1220\(a\)\(2\)](#).

FINRA Series 28 Introducing Broker/Dealer Financial and Operations Principal

The Series 28 exam — the Introducing Broker-Dealer Financial and Operations Principal Qualification Exam (FI) — assesses the competency of an entry-level principal to perform their job as a financial and operations principal in an introducing broker-dealer that does not carry customer accounts or hold customer funds or securities.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of a financial and operations principal, including the financial responsibilities, rules and recordkeeping requirements of broker-dealers. For more information about the Series 28 exam, refer to [FINRA Rule 1210](#) and [FINRA Rule 1220\(a\)\(4\)](#).

FINRA Series 53 Municipal Securities Principal

The Series 53 exam—the Municipal Securities Principal Qualification Examination (MP)—is a [Municipal Securities Rulemaking Board](#) (MSRB) exam.

The exam consists of 100 scored questions. Candidates are given three hours to complete the exam. The passing score is 70%.

The Municipal Securities Principal Qualification Examination is designed to determine whether an individual meets the MSRB's qualification standards for municipal securities principals. To do this, the examination measures a candidate's knowledge of MSRB rules, rule interpretations and federal statutory provisions applicable to the activities listed above. It also measures the candidate's ability to apply these rules and interpretations to given fact situations.

For additional information on this exam, including the content outline, please visit [MSRB Professional Qualification](#).

FINRA Series 63 Uniform Securities Agent State Law

The Series 63 exam — the Uniform Securities State Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 60 scored questions. Candidates have 75 minutes to complete the exam. In order for a candidate to pass the Series 63 exam, he/she must correctly answer at least 43 of the 60 scored questions.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website](#).

FINRA Series 79 Limited Representative – Investment Banking

The Series 79 exam — the Investment Banking Representative Exam — assesses the competency of an entry-level registered representative to perform their job as an investment banking representative.

The Series 79 exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of an investment banking representative, including advising on or facilitating debt or equity securities offerings through a private placement or a public offering and mergers and acquisitions.

Candidates must pass the [Securities Industry Essentials \(SIE\)](#) exam and the Series 79 exam to obtain the Investment Banking Representative registration. For more information about the SIE and Series 79 exams, refer to [FINRA Rule 1210](#) and [FINRA Rule 1220\(b\)\(5\)](#).

FINRA Series 99 Operations Professional

The Series 99 exam — the Operations Professional Exam — assesses the competency of an entry-level registered representative to perform their job as an operations professional.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of an operations professional, including customer onboarding; financial control; receipt and delivery of securities and funds and account transfers; and collection, maintenance, reinvestment and disbursements of funds.

Candidates must pass the [Securities Industry Essentials \(SIE\)](#) exam and the Series 99 exam to obtain the Operations Professional registration. For more information about the SIE and Series 99 exams, refer to [FINRA Rule 1210](#) and [FINRA Rule 1220\(b\)\(3\)](#).

Life, Health & Variable Annuities Florida 2-15 license

An individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the same insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured's disability; and optional modes of settlement of proceeds of life insurance. Representing a health maintenance organization or, as to health insurance only, an insurer transacting health insurance; insurance against loss through sickness or accidental bodily injury.

Mutual Trust Asset Management, Inc.

Form ADV Part 2B Brochure Supplement

Cover Page

Name of Supervised Person/IA Rep	Matthew Marone
Date of Last Revision	March 2020

Name of Registered Investment Advisor	Mutual Trust Asset Management, Inc. (MTAM)
Address	2963 Gulf to Bay Blvd, Suite 330
Phone Number	(727) 799-9922
Website Address	None

This Brochure Supplement provides information about Matt that supplements the Mutual Trust Asset Management, Inc brochure. You should have received a copy of that brochure. Please contact Matt, if you did not receive Mutual Trust Asset Management, Inc's brochure or if you have any questions about the contents of this supplement. Additional information about Matt is available on the SEC's website at: www.adviserinfo.sec.gov (Matthew's CRD # 2651141)

I read, received and understand Form ADV.

Client Name

Date

Client Name

Date

Educational Background and Business Experience

Education and Business Background

Name: Matthew E Marone

Year of Birth: 1970

Education: University of South Florida
BS Finance, 1994

Business: Mutual Trust Asset Management, Inc., Clearwater, FL, Investment Advisor Representative
2008 - Present

Mutual Trust Company of America Securities, Clearwater, FL, Registered Representative
1999 – Present

Locust Street Securities, Des Moines, Iowa Registered Representative
1995 – 1999

Professional Designations Qualifications

Financial Industry Regulatory Authority (FINRA) Licenses

FINRA SIE	Securities Industry Essentials Examination	2018
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FINRA Series 6	Investment Company Products/Variable Contracts Representative Examination	1995
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FINRA Series 7	General Securities Representative Examination	2006
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FINRA Series 63	Uniform Securities Agent State Law Examination	1999
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CFP®	Certified Financial Planner Certificant	08/2009
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Life, Health & Variable Annuities Florida 2-15 license		1993
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Please see below for the descriptions of the Designations/Examinations

Disciplinary Information

Mr. Marone does not have a disciplinary history.

Other Business Activities

Matthew Marone is in the business of selling securities and insurance. These business activities represent approximately 90% of time which represents 16 hours a month.

Matthew Marone is associated with Mutual Trust Company of America Securities, Inc. as a Registered Representative. He may recommend securities offered by Mutual Trust Company of America Securities, Inc. or its affiliates. If clients purchase these products through him, he will receive the normal commissions or fees. Thus, a conflict exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through Mutual Trust Asset Management, Inc. or through Mutual Trust Company of America Securities, Inc. We seek to mitigate the conflict by making recommendations in the best interest of the client.

Matthew Marone is licensed with several life, health, and variable annuity insurance companies. Insurance products offered by these companies may be recommended. If clients purchase these products through him, he will receive the normal commissions. Thus a conflict of interest exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through MTAM or through these insurance companies. The client may purchase the recommended products through an unaffiliated service provider.

Matthew Marone also has an ownership interest in several residential investment properties for which he provides his own management services.

Additional Compensation

(Please refer to the conflicts associated with the Additional Compensation in the section above titled Other Business Activities)

As a Registered Representative of Mutual Trust Company of America Securities, INC. Matthew Marone will be compensated for effecting securities transactions on the normal commission schedule.

When appropriate Matthew Marone will recommend various individual equity and fixed income securities, including options for which he will receive commissions.

When appropriate Matthew Marone will recommend mutual funds or variable annuities that pay commissions (including 12(b)-1 fees or other compensation) from the respective product sponsor. All allowable compensation is disclosed in the prospectus.

When appropriate Matthew Marone will recommend insurance policies that pay him commissions from the respective insurance companies.

The above additional compensation represents a conflict of interest. MTAM Code of Ethics and internal policies require all recommendations place the interest of the client first. Accounts are reviewed on a regular basis to ensure compliance with the Code of Ethics and conflict of interest policies.

Supervision

Matthew Marone formulates his own investment advice. In that capacity, Matthew Marone is supervised by Mr. Jed E. Bandes. Jed, as Owner and Chief Compliance Officer, monitors portfolios for investment objectives and other supervisory reviews and is responsible for all advice provided to clients. Jed may be contacted at the phone number of the main office as shown on the cover page.

Descriptions Designations/Examinations

FINRA SIE Securities Industry Essentials Examination

The Securities Industry Essentials® (SIE®) Exam is a new FINRA exam for prospective securities industry professionals. This introductory-level exam assesses a candidate's knowledge of basic securities industry information including concepts fundamental to working in the industry, such as types of products and their risks; the structure of the securities industry markets, regulatory agencies and their functions; and prohibited practices.

Passing the SIE alone does not qualify an individual for registration with a FINRA member firm or to engage in securities business. In order to become registered to engage in securities business, an individual must pass the SIE and a qualification exam appropriate for the type of business the individual will engage in. The individual must be associated with a member firm to take a qualification exam.

FINRA Series 6 Investment Company Products/Variable Contracts Representative Examination

The Series 6 exam — the Investment Company and Variable Contracts Products Representative Qualification Examination (IR) — assesses the competency of an entry-level representative to perform their job as an investment company and variable contracts products representative.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of an investment company and variable contract products representative, including sales of mutual funds and variable annuities.

Candidates must pass the Securities Industry Essentials (SIE) exam and the Series 6 exam to obtain the Investment Company and Variable Contracts Products registration. For more information about the SIE and Series 6 exams, refer to FINRA Rule 1210 and FINRA Rule 1220(b)(7).

FINRA Series 7 General Securities Representative Examination

The Series 7 exam — the General Securities Representative Qualification Examination (GS) — assesses the competency of an entry-level registered representative to perform their job as a general securities representative.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of a general securities representative, including sales of corporate securities, municipal securities, investment company securities, variable annuities, direct participation programs, options and government securities.

Candidates must pass the Securities Industry Essentials (SIE) exam and the Series 7 exam to obtain the General Securities Representative registration. For more information about the SIE and Series 7 exams, refer to FINRA Rule 1210 and FINRA Rule 1220(b)(2).

FINRA Series 63 Uniform Securities Agent State Law Examination

The Series 63 exam — the Uniform Securities State Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 60 scored questions. Candidates have 75 minutes to complete the exam. In order for a candidate to pass the Series 63 exam, he/she must correctly answer at least 43 of the 60 scored questions.

For additional information about this exam, including the content outline, please visit the exams page on the NASAA website.

CFP® Certified Financial Planner Certificant

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals. Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:
 - Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
 - Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Life, Health & Variable Annuities Florida 2-15 license

An individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the same insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured’s disability; and optional modes of settlement of proceeds of life insurance. Representing a health maintenance organization or, as to health insurance only, an insurer transacting health insurance; insurance against loss through sickness or accidental bodily injury.

Mutual Trust Asset Management, Inc.

Form ADV Part 2B Brochure Supplement

Cover Page

Name of Supervised Person/IA Rep	Peter J. Taurinskas
Date of Last Revision	March 2020

Name of Registered Investment Advisor	Mutual Trust Asset Management, Inc. (MTAM)
Address	2963 Gulf to Bay Blvd, Suite 330
Phone Number	(727) 799-9922
Website Address	None

This Brochure Supplement provides information about Peter that supplements the Mutual Trust Asset Management, Inc brochure. You should have received a copy of that brochure. Please contact Peter, if you did not receive Mutual Trust Asset Management, Inc's brochure or if you have any questions about the contents of this supplement. Additional information about Peter is available on the SEC's website at: www.adviserinfo.sec.gov (Peter's CRD # 4184652)

I read, received and understand Form ADV.

Client Name

Date

Client Name

Date

Educational Background and Business Experience

Education and Business Background

Name: Peter J. Taurinskas

Year of Birth: 1974

Education: Gustavus Adolphus College, St. Peter, MN
Bachelor of Arts, Communication Studies, 1997

Business:

Mutual Trust Asset Management Investment Adviser Representative	08/2014-Present
Mutual Trust Co Of America Registered Rep	07/2007-Present
American Home Realty Company Inc., MN Real Estate Salesperson	1995 - 2016
Merrill Lynch, St. Paul, MN Financial Advisor Trainee	3/2000 – 8/2000
FFP Securities, Inc., Edina, MN, Registered Representative	2000-2002
Sammons Securities Company, Apple Valley, MN, Reg Rep	2002-2007
Prime Capital Financial Services, So. St. Paul, MN, Reg Rep	02/2007-07/2007

Professional Designations Qualifications

Financial Industry Regulatory Authority (FINRA) Licenses	
FINRA Series 7 General Securities Representative	07/2007
FINRA Series 63 Uniform Securities Agent State Law	03/2001
FINRA Series 66 Uniform Combines Securities Agent State Law	07/2017
CEP®, Certified Estate Planner Certificant	06/2011
Life & Health & Variable Annuities	2001
Notary Public Commission	
Minnesota State Real Estate Salesperson	1995

Disciplinary Information

Supervised persons are required to report on Form ADV Part 2 B, if there are any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person and disclose all material facts regarding those events. Mr. Taurinskas has nothing to report.

Other Business Activities

Peter Taurinkas is in the business of selling securities and insurance. These business activities represent approximately 95% of time and income.

Peter Taurinkas is associated with Mutual Trust Company of America Securities, Inc. as a Registered Representative. He may recommend securities offered by Mutual Trust Company of America Securities, Inc. or its affiliates. If clients purchase these products through him, he will receive the normal commissions or fees. Thus, a conflict exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through Mutual Trust Asset Management, Inc. or through Mutual Trust Company of America Securities, Inc.

Peter Taurinkas is licensed with several life, health, and variable annuity insurance companies. Insurance products offered by these companies may be recommended. If clients purchase these products through him, he will receive the normal commissions. Thus a conflict of interest exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through MTAM or through these insurance companies. We seek to mitigate any conflict by making recommendations in the best interest of the client.

Additional Compensation

When appropriate Peter Taurinkas will recommend insurance policies that pay commissions from the respective insurance companies.

The above additional compensation represents conflict of interest. MTAM Code of Ethics and internal policies require all recommendations place the interest of the client first. Accounts are reviewed on a regular basis to ensure compliance with the Code of Ethics and conflict of interest policies.

Supervision

Peter Taurinkas formulates his own investment advice as an investment advisor. In that capacity, Peter Taurinkas is supervised by Mr. Jed E. Bandes. Jed, as Owner and Chief Compliance Officer, monitors portfolios for investment objectives and other supervisory reviews and is responsible for all advice provided to clients. Jed may be contacted at the phone number of the main office as shown on the cover page.

FINRA Series 7 General Securities Representative

The Series 7 exam — the General Securities Representative Qualification Examination (GS) — assesses the competency of an entry-level registered representative to perform their job as a general securities representative.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of a general securities representative, including sales of corporate securities, municipal securities, investment company securities, variable annuities, direct participation programs, options and government securities.

Candidates must pass the Securities Industry Essentials (SIE) exam and the Series 7 exam to obtain the General Securities Representative registration. For more information about the SIE and Series 7 exams, refer to FINRA Rule 1210 and FINRA Rule 1220(b)(2).

FINRA Series 63 Uniform Securities Agent State Law

The Series 63 exam — the Uniform Securities State Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 60 scored questions. Candidates have 75 minutes to complete the exam. In order for a candidate to pass the Series 63 exam, he/she must correctly answer at least 43 of the 60 scored questions.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website](#).

FINRA Series 66 Uniform Combines Securities Agent State Law

The Series 66 exam — the NASAA Uniform Combined State Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 100 scored questions. Candidates have 150 minutes to complete the exam. In order for a candidate to pass the Series 66 Exam, he/she must correctly answer at least 73 of the 100 scored questions.

There is no prerequisite for the Series 66 examination. However, the [Series 7](#) examination is a **co-requisite** to the Series 66 Examination.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website](#).

CEP®, Certified Estate Planner Certificant

There are eight study modules that cover estate taxes, wills, trusts and directives, planning for incapacity, funding bequests, protecting wealth and insurance. Students also learn about estate planning law and how to avoid violations, which particularly benefits students whose practice is in financial advisory or accounting,

Finally, students must pass a proctored closed-book exam by answering a minimum of 70 percent of questions correctly. If students fail, they have three additional opportunities to earn certification. In addition, CEPs must complete eight hours of continuing education every two years. They also must follow NICEP's code of ethics, which requires compliance with federal and state licensing authorities and professional organizations and business behavior. However, NICEP can revoke certification at its discretion.

Life, Health & Variable Annuities Florida 2-15 license

An individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the same insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured's disability; and optional modes of settlement of proceeds of life insurance. Representing a health maintenance organization or, as to health insurance only, an insurer transacting health insurance; insurance against loss through sickness or accidental bodily injury.

Mutual Trust Asset Management, Inc.

Form ADV Part 2B Brochure Supplement

Cover Page

Name of Supervised Person/IA Rep	Michael D. Riley
Date of Last Revision	March 2020

Name of Registered Investment Advisor	Mutual Trust Asset Management, Inc. (MTAM)
Address	2963 Gulf to Bay Blvd, Suite 330
Phone Number	(727) 799-9922
Website Address	None

This Brochure Supplement provides information about Michael D. Riley that supplements the Mutual Trust Asset Management, Inc brochure. You should have received a copy of that brochure. Please contact Mr. Riley, if you did not receive Mutual Trust Asset Management, Inc's brochure or if you have any questions about the contents of this supplement. Additional information about Michael is available on the SEC's website at: www.adviserinfo.sec.gov (Michael's CRD # 2341131)

I read, received and understand Form ADV.

Client Name

Date

Client Name

Date

Educational Background and Business Experience

Education and Business Background

Name: Michael D. Riley

Year of Birth: 1964

Education: Springfield Technical Community College
2 years

Business:

Mutual Trust Asset Management, Inc., Clearwater, FL, IA Representative
2005 - Present

Mutual Trust Company of America Securities, Inc, Clearwater, FL, Registered Representative
1993 - Present

Estate and Retirement Resources, Ocala, FL, Owner, President,
1998 - Present

Professional Designations Qualifications

CFP®, Certified Financial Planner 2006

ChFC®, Chartered Financial Consultant is issued by the American College. 2008

CLU, Chartered Life Underwriter – 2013

Financial Industry Regulatory Authority (FINRA) Licenses

FINRA Series SIE Securities Industry Essentials Examination 2018

FINRA Series 6 Mutual Fund Representative 1993

FINRA Series 7 General Securities Representative 2003

FINRA Series 66 Uniform Combined Securities Agent State Law 2005

Life, Health & Variable Annuities 1993

Please see below for the descriptions of the Designations/Examinations

Disciplinary Information

Supervised persons are required to report on Form ADV Part 2 B, if there are any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person and disclose all material facts regarding those events. Michael D. Riley has nothing to report.

Other Business Activities

Michael Riley is in the business of selling securities and insurance. These business activities represent approximately 90% of time and income.

Michael Riley is associated with Mutual Trust Company of America Securities, Inc. as a Registered Representative. He may recommend securities, asset management, or insurance products offered by Mutual Trust Company of America Securities, Inc. or its affiliates. If clients purchase these products through him, he will receive the normal commissions or fees. Thus, a conflict exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to

purchase products either through Mutual Trust Asset Management, Inc. or through Mutual Trust Company of America Securities, Inc.

In his capacity as President of Estate and Retirement Resources, Inc, Michael Riley is licensed with several life, health, and variable annuity insurance companies. Insurance products offered by these companies may be recommended. If clients purchase these products through him, he will receive the normal commissions. Thus, a conflict of interest exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through Estate and Retirement Resources, Inc or through these insurance companies. We seek to mitigate any conflict by making recommendations in the best interest of the client.

Additional Compensation

(Please refer to the conflicts associated with the Additional Compensation in the section above titled Other Business Activities)

As a Registered Representative of Mutual Trust Company of America Securities, Inc. Michael Riley will be compensated for effecting securities transactions on the normal commission schedule.

When appropriate Michael Riley will recommend various individual equity and fixed income securities, including options for which he will receive commissions.

When appropriate Michael Riley will recommend mutual funds or variable annuities that pay commissions (including 12(b)-1 fees or other compensation) from the respective product sponsor. All allowable compensation is disclosed in the prospectus.

When appropriate Michael Riley will recommend insurance policies that pay commissions from the respective insurance companies.

The above additional compensation represents a conflict of interest. MTAM Code of Ethics and internal policies require all recommendations place the interest of the client first. Accounts are reviewed on a regular basis to ensure compliance with the Code of Ethics and conflict of interest policies.

Supervision

Michael Riley formulates his own investment advice. In that capacity, Michael Riley is supervised by Mr. Jed E. Bandes. Jed, as Owner and Chief Compliance Officer, monitors portfolios for investment objectives and other supervisory reviews and is responsible for all advice provided to clients. Jed may be contacted at the phone number of the main office as shown on the cover page.

CFP®, Certified Financial Planner

The **CERTIFIED FINANCIAL PLANNER™**, **CFP®** and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

ChFC®, Chartered Financial Consultant is issued by the American College.

Candidates must meet the following requirements:

- Complete 6 core and 2 elective courses
- Final proctored exam for each course
- 3 years of full-time business experience within the preceding 5 years
- Continuing education requirement of 30 hours every 2 years

CLU, Chartered Life Underwriter –

Your Chartered Life Underwriter has earned the premier credential in the insurance profession, representing eight or more comprehensive college-level courses covering all aspects of insurance planning, estate and retirement issues, taxation business insurance, and risk management. For more than 80 years consumers have trusted this mark, which is conferred by the American College, a non-profit educator with the highest level of accreditation.

The average study time for the program is over 400 hours and can take years to earn. Each CLU must also complete a minimum of 30 hours of continuing education every two years, adhere to strict ethical standards, and meet extensive experience requirements, ensuring the knowledge you're counting on is both comprehensive and current.

FINRA Series SIE Securities Industry Essentials Examination

The Securities Industry Essentials[®] (SIE[®]) Exam is a new FINRA exam for prospective securities industry professionals. This introductory-level exam assesses a candidate's knowledge of basic securities industry information including concepts fundamental to working in the industry, such as types of products and their risks; the structure of the securities industry markets, regulatory agencies and their functions; and prohibited practices.

Passing the SIE alone does not qualify an individual for registration with a FINRA member firm or to engage in securities business. In order to become registered to engage in securities business, an individual must pass the SIE and a qualification exam appropriate for the type of business the individual will engage in. The individual must be associated with a member firm to take a qualification exam.

FINRA Series 6 Investment Company and Variable Contracts Products

The Series 6 exam — the Investment Company and Variable Contracts Products Representative Qualification Examination (IR) — assesses the competency of an entry-level representative to perform their job as an investment company and variable contracts products representative. The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of an investment company and variable contract products representative, including sales of mutual funds and variable annuities.

Candidates must pass the [Securities Industry Essentials \(SIE\)](#) exam and the Series 6 exam to obtain the Investment Company and Variable Contracts Products registration. For more information about the SIE and Series 6 exams, refer to [FINRA Rule 1210](#) and [FINRA Rule 1220\(b\)\(7\)](#).

FINRA Series 7 General Securities Representative

The Series 7 exam — the General Securities Representative Qualification Examination (IR) — assesses the competency of an entry-level representative to perform their job as an investment company and variable contracts products representative.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of an investment company and variable contract products representative, including sales of mutual funds and variable annuities.

Candidates must pass the Securities Industry Essentials (SIE) exam and the Series 6 exam to obtain the Investment Company and Variable Contracts Products registration. For more information about the SIE and Series 6 exams, refer to FINRA Rule 1210 and FINRA Rule 1220(b)(7).

FINRA Series 66 Uniform Combined Securities Agent State Law

The Series 66 exam — the NASAA Uniform Combined State Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 100 scored questions. Candidates have 150 minutes to complete the exam. In order for a candidate to pass the Series 66 Exam, he/she must correctly answer at least 73 of the 100 scored questions.

There is no prerequisite for the Series 66 examination. However, the [Series 7](#) examination is a **co-requisite** to the Series 66 Examination.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website](#).

Life, Health & Variable Annuities Florida 2-15 license

An individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the same insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured's disability; and optional modes of settlement of proceeds of life insurance. Representing a health maintenance organization or, as to health insurance only, an insurer transacting health insurance; insurance against loss through sickness or accidental bodily injury.

Mutual Trust Asset Management, Inc.

Form ADV Part 2B Brochure Supplement

Cover Page

Name of Supervised Person/IA Rep	Gerald E. Shaw, Jr.
Date of Last Revision	March 2020
Name of Registered Investment Advisor	Mutual Trust Asset Management, Inc. (MTAM)
Address	2963 Gulf to Bay Blvd, Suite 330
Phone Number	(727) 799-9922
Website Address	None

This Brochure Supplement provides information about Gerald “Jerry” E. Shaw, Jr. that supplements the Mutual Trust Asset Management, Inc brochure. You should have received a copy of that brochure. Please contact Jerry, if you did not receive Mutual Trust Asset Management, Inc’s brochure or if you have any questions about the contents of this supplement. Additional information about Jerry is available on the SEC’s website at: www.adviserinfo.sec.gov (Jerry’s CRD#1305370)

I read, received and understand Form ADV.

Client Name

Date

Client Name

Date

Educational Background and Business Experience

Education and Business Background

Name: Gerald E. Shaw, Jr.

Year of Birth: 1953

Education: The College for Financial Planning, Denver
CFP® Certified Financial Planner, 2000
The University of Michigan, Ann Arbor
MA English Language and Literature, 1981
Western Michigan University, Kalamazoo
BA English, 1979

Business: Mutual Trust Asset Management, Inc., Clearwater, FL, IA Representative
2015 - Present
Mutual Trust Company of America Securities, Clearwater, FL, Registered Representative
2015 - Present
Summit Brokerage Services, Inc., Boca Raton, FL Registered Representative
2012 – 2015
Summit Financial Group, Inc., Boca Raton, FL IA Representative
2012 – 2015
Sigma Financial Corp., Ann Arbor, MI Registered Representative
2007 – 2012
Sigma Planning Corp., Ann Arbor, MI IA Representative
2007 – 2012
Prime Capital, Inc., Poughkeepsie, NY Registered Representative
2007 (9 months)
Sigma Financial Corp., Ann Arbor, MI Registered Representative
1995 – 2007
Sigma Planning Corp., Ann Arbor, MI IA Representative
1995 - 2007

Professional Designations Qualifications

Financial Industry Regulatory Authority (FINRA) Licenses

FINRA SIE	Securities Industry Essentials Examination	10/2018
FINRA Series 7	General Securities Representative	03/2013
FINRA Series 63	Uniform Securities Agent State Law	10/1984
FINRA Series 65	NASAA-Investment Advisors Law	01/2000

Life, Health & Variable Annuity - Michigan	06/1984
Life, Health & Variable Annuities - Florida	09/1998

Please see below for the descriptions of the Designations

Disciplinary Information

Supervised persons are required to report on Form ADV Part 2 B, if there are any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person and disclose all material facts regarding those events. Mr. Shaw has nothing to report.

Other Business Activities

Mr. Shaw is in the business of selling securities and insurance. These business activities represent approximately 90% of time and income.

Mr. Shaw is associated with Mutual Trust Company of America Securities, Inc. as a Registered Representative. He may recommend securities offered by Mutual Trust Company of America Securities, Inc. or its affiliates. If clients purchase these products through him, he will receive the normal commissions or fees. Thus, a conflict exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through Mutual Trust Asset Management, Inc. or through Mutual Trust Company of America Securities, Inc.

Mr. Shaw is licensed with several life, health, and variable annuity insurance companies. Insurance products offered by these companies may be recommended. If clients purchase these products through him, he will receive the normal commissions. Thus a conflict of interest exists between his interests and those of his advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through MTAM or through these insurance companies.

Additional Compensation

As a Registered Representative of Mutual Trust Company of America Securities, Inc. Jerry will be compensated for effecting securities transactions on the normal commission schedule.

Jerry may recommend various individual equity and fixed income securities, including options for which he will receive commissions.

Jerry may recommend mutual funds or variable annuities that pay commissions (including 12(b)-1 fees or other compensation) from the respective product sponsor. All allowable compensation is disclosed in the prospectus.

Mr. Shaw may recommend insurance policies that pay commissions from the respective insurance companies.

Supervision

Mr. Shaw formulates his own investment advice. In that capacity, Mr. Shaw is supervised by Mr. Jed E. Bandes. Jed, as Owner and Chief Compliance Officer, monitors portfolios for investment objectives and other supervisory reviews and is responsible for all advice provided to clients. Jed may be contacted at the phone number of the main office as shown on the cover page.

Financial Industry Regulatory Authority (FINRA) Licenses

FINRA Series 7 General Securities Representative

The Series 6 exam — the Investment Company and Variable Contracts Products Representative Qualification Examination (IR) — assesses the competency of an entry-level representative to perform their job as an investment company and variable contracts products representative.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of an investment company and variable contract products representative, including sales of mutual funds and variable annuities.

Candidates must pass the Securities Industry Essentials (SIE) exam and the Series 6 exam to obtain the Investment Company and Variable Contracts Products registration. For more information about the SIE and Series 6 exams, refer to FINRA Rule 1210 and FINRA Rule 1220(b)(7).

FINRA Series 65 Uniform Investment Advisor Law Examination

The Series 65 exam — the NASAA Investment Advisers Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 130 scored questions. Candidates have 180 minutes to complete the exam. In order for a candidate to pass the Series 65 exam, he/she must correctly answer at least 94 of the 130 scored questions.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website](#).

Life, Health & Variable Annuities Florida 2-15 license

An individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the same insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured's disability; and optional modes of settlement of proceeds of life insurance. Representing a health maintenance organization or, as to health insurance only, an insurer transacting health insurance; insurance against loss through sickness or accidental bodily injury.

Mutual Trust Asset Management, Inc.

Form ADV Part 2B Brochure Supplement

Cover Page

Name of Supervised Person/IA Rep	Sean Pendray
Date of Last Revision	March 2020

Name of Registered Investment Advisor	Mutual Trust Asset Management, Inc. (MTAM)
Address	2963 Gulf to Bay Blvd, Suite 330
Phone Number	(727) 799-9922
Website Address	None

This Brochure Supplement provides information about Sean S. Pendray that supplements the Mutual Trust Asset Management, Inc brochure. You should have received a copy of that brochure. Please contact Sean, if you did not receive Mutual Trust Asset Management, Inc's brochure or if you have any questions about the contents of this supplement. Additional information about Sean is available on the SEC's website at: www.adviserinfo.sec.gov (Sean's CRD # 2465849)

I read, received and understand Form ADV.

Client Name

Date

Client Name

Date

Educational Background and Business Experience

Education and Business Background

Name: Sean S. Pendray

Year of Birth: 1970

Education: Florida State University, Tallahassee, FL
BS Political Science and Psychology minor, 1992
University of Miami, Miami, FL
Masters in Public Administration, 1993

Business: Pendray Financial, Coral Gables, FL
2012 - Present
Mutual Trust Asset Management, Inc., Clearwater, FL, IA Representative
2018 - Present
Mutual Trust Company of America Securities, Clearwater, FL, Registered Representative
2017 - Present
Freedom Investors Corporation, Brookfield, WI
2012 – 2017

Professional Designations Qualifications

Financial Industry Regulatory Authority (FINRA) Licenses		
FINRA Series SIE	Securities Industry Essentials Examination	2018
FINRA Series 6	Investment Company Products/Variable Contracts Limited Representative	2006
FINRA Series 65	NASAA-Investment Advisors Law	2008
FINRA Series 63	Uniform Securities Agent Law	2017
FINRA Series 62	Corporate Securities Limited Representative	2013
Life, & Annuities Licenses		
Certified Structured Settlement Consultant		2008

Disciplinary Information

Supervised persons are required to report on Form ADV Part 2 B, if there are any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person and disclose all material facts regarding those events. Sean Pendray has nothing to report.

Other Business Activities

Sean Pendray is in the business of selling securities and insurance. These business activities represent approximately 20% of time and income.

Sean Pendray is associated with Mutual Trust Company of America Securities, Inc. as a Registered Representative. He may recommend securities offered by Mutual Trust Company of America Securities, Inc. or its affiliates. If clients purchase these products through him, he will receive the normal commissions or fees. Thus, a conflict exists between his interests and those of advisory clients. The

client is under no obligation to purchase products recommended, or to purchase products either through Mutual Trust Asset Management, Inc. or through Mutual Trust Company of America Securities, Inc.

Sean Pendray is licensed with several life, health, and variable annuity insurance companies. Insurance products offered by these companies may be recommended. If clients purchase these products through him, he will receive the normal commissions. Thus, a conflict of interest exists between his interests and those of his advisory clients. The client is under no obligation to purchase products recommended, or to purchase products either through MTAM or through these insurance companies. We seek to mitigate any conflict by making recommendations in the best interest of the client.

Sean is the principal and owner of Pendray Financial Advisory Incorporated, a boutique financial advising practice serving high net worth and sudden wealth clients. He is also a planner/partner with Synergy Settlement Services in South Florida working with attorneys and their plaintiff clients within the legal settlement planning world. Mr. Pendray runs the Miami/Ft. Lauderdale/WPB office and is located at 9100 Dade Land Blvd, Ste 1600, Miami, FL.

Additional Compensation

(Please refer to the conflicts associated with the Additional Compensation in the section above titled Other Business Activities)

As a Registered Representative of Mutual Trust Company of America Securities, Inc. Sean will be compensated for effecting securities transactions on the normal commission schedule.

When appropriate Sean Pendray will recommend mutual funds or variable annuities that pay commissions (including 12(b)-1 fees or other compensation) from the respective product sponsor. All allowable compensation is disclosed in the prospectus.

When appropriate Sean Pendray will recommend insurance policies that pay commissions from the respective insurance companies.

The above additional compensation represents a conflict of interest. MTAM Code of Ethics and internal policies require all recommendations place the interest of the client first. Accounts are reviewed on a regular basis to ensure compliance with the Code of Ethics and conflict of interest policies.

Supervision

Sean Pendray formulates his own investment advice. In that capacity, Sean Pendray is supervised by Mr. Jed E. Bandes. Jed, as Owner and Chief Compliance Officer, monitors portfolios for investment objectives and other supervisory reviews and is responsible for all advice provided to clients. Jed may be contacted at the phone number of the main office as shown on the cover page.

Financial Industry Regulatory Authority (FINRA) Licenses

FINRA Series SIE Securities Industry Essentials Examination

The Securities Industry Essentials[®] (SIE[®]) Exam is a new FINRA exam for prospective securities industry professionals. This introductory-level exam assesses a candidate's knowledge of basic securities industry information including concepts fundamental to working in the industry, such as

types of products and their risks; the structure of the securities industry markets, regulatory agencies and their functions; and prohibited practices.

Passing the SIE alone does not qualify an individual for registration with a FINRA member firm or to engage in securities business. In order to become registered to engage in securities business, an individual must pass the SIE and a qualification exam appropriate for the type of business the individual will engage in. The individual must be associated with a member firm to take a qualification exam.

FINRA Series 6 Investment Company Products/Variable Contracts Limited Representative

The Series 6 exam — the Investment Company and Variable Contracts Products Representative Qualification Examination (IR) — assesses the competency of an entry-level representative to perform their job as an investment company and variable contracts products representative. The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of an investment company and variable contract products representative, including sales of mutual funds and variable annuities.

Candidates must pass the [Securities Industry Essentials \(SIE\)](#) exam and the Series 6 exam to obtain the Investment Company and Variable Contracts Products registration. For more information about the SIE and Series 6 exams, refer to [FINRA Rule 1210](#) and [FINRA Rule 1220\(b\)\(7\)](#).

FINRA Series 65 Uniform Investment Advisor Law Examination

. The Series 65 exam — the NASAA Investment Advisers Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 130 scored questions. Candidates have 180 minutes to complete the exam. In order for a candidate to pass the Series 65 exam, he/she must correctly answer at least 94 of the 130 scored questions.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website](#).

FINRA Series 63 Uniform Securities Agent Law

The Series 63 exam — the Uniform Securities State Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 60 scored questions. Candidates have 75 minutes to complete the exam. In order for a candidate to pass the Series 63 exam, he/she must correctly answer at least 43 of the 60 scored questions.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website](#).

FINRA Series 62 Corporate Securities Limited Representative

The Series 62 exam — is a certification providing registered representatives with the authority to transact corporate equities and corporate debt securities for clients.

The exam consists of 115 scored questions. Candidates have 150 minutes to complete the exam. In order for a candidate to pass the Series 62 exam, he/she must correctly answer at least 81 of the 115 scored questions. For more information about Series 62 exams, refer to FINRA Rule 1210 and FINRA Rule 1220(b)(7).

Life, Health & Variable Annuities Florida 2-15 license

An individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the

same insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured's disability; and optional modes of settlement of proceeds of life insurance. Representing a health maintenance organization or, as to health insurance only, an insurer transacting health insurance; insurance against loss through sickness or accidental bodily injury.

Certified Structured Settlement Consultant

The NSSTA Certified Structured Settlement Consultant® (CSSC®) is the industry's oldest and most respected designation, establishing educational standards for structured settlement professionals throughout the nation.

Nearly 550 structured settlement consultants have earned the distinguished CSSC® designation. The program, developed in conjunction with the University of Notre Dame, consists of more than 80 hours of classroom and study culminating in a comprehensive examination.

The NSSTA CSSC® Program includes an intensive pre-program study and classroom sessions covering a variety of topics and issues that directly relate to daily structured settlements business.

The NSSTA CSSC® Program, which is updated annually, provides a comprehensive understanding of structured settlements, combining academic rigor and perspective with the latest developments impacting the industry, including:

- Settlement Planning and Needs Based Negotiation
- Business ethics
- Federal tax law overview and industry applications
- Fixed income
- Trusts- Special needs and Medical reversionary trusts
- Medicare set aside accounts
- Negotiation strategy
- Settlement documentation
- Claim valuation
- Actual industry case studies
- Tort law, guardianship fundamentals, state and federal jurisdiction issues from a litigant's perspective, laws which impact NSSTA members
- Insurance claims practice
- Loss reserving

Mutual Trust Asset Management, Inc

Form ADV Part 2B Brochure Supplement

Cover Page

Name of Supervised Person/IA Rep	Allen Leroy “Roy” Claggett
Date of Last Revision	March 2020

Name of Registered Investment Advisor	Mutual Trust Asset Management, Inc. (MTAM)
Address	2963 Gulf to Bay Blvd, Suite 330
Phone Number	(727) 799-9922
Website Address	None

This Brochure Supplement provides information about Roy Claggett that supplements the Mutual Trust Asset Management, Inc brochure. You should have received a copy of that brochure. Please contact Roy, if you did not receive Mutual Trust Asset Management, Inc’s brochure or if you have any questions about the contents of this supplement. Additional information about Roy is available on the SEC’s website at: www.adviserinfo.sec.gov (Roy’s CRD # 5694090)
I read, received and understand Form ADV.

Client Name

Date

Client Name

Date

Education and Business Background

Name: Roy Claggett

Year of Birth: 1986

Education: Graduated from University of Florida, Finance and Statistics

Business

Mutual Trust Asset Management, Inc. - 2/2015 - Present

The Holland Group – 11/2014 – Present

AXA Advisors – 8/2010 – 11/2014

Northwestern Mutual – 6/2009-9/2009

Professional Designations Qualifications

Series 66 Uniform Investment Advisor 12/2010

Insurance Licenses

Life, Health & Variable Annuities 2009

Disciplinary Information

Supervised persons are required to report on Form ADV Part 2 B, if there are any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person and disclose all material facts regarding those events. Allen Leroy "Roy" Claggett has nothing to report.

Other Business Activities

Roy Claggett is in the business of providing Investment Advisory Services and selling insurance. Selling insurance is not part of Roy's investment advisory activity and it is not related to his association with Mutual Trust Asset Management, Inc. nor is his insurance activities supervised by or the responsibility of Mutual Trust Asset Management, Inc. Investment advisory and insurance activities represent 100% of Roy's time and income.

Roy Claggett is licensed with several life, health, and variable annuity insurance companies. Insurance products offered by these companies may be recommended. If clients purchase these products through him, he will receive the normal commissions. Mutual Trust Asset Management, Inc. does not supervise the sale of, nor take responsibility for, the sale of any insurance related products. Thus, a conflict of interest exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products through MTAM or through these insurance

companies. We seek to mitigate any conflict by making recommendations in the best interest of the client.

Additional Compensation

(Please refer to the conflicts associated with the Additional Compensation in the section above titled Other Business Activities)

When appropriate Roy Claggett will recommend insurance policies that pay commissions from the respective insurance companies.

The above additional compensation represents a conflict of interest. MTAM Code of Ethics and internal policies require all recommendations place the interest of the client first. Accounts are reviewed on a regular basis to ensure compliance with the Code of Ethics and conflict of interest policies.

Supervision

Roy Claggett formulates his own investment advice. In that capacity, Roy Claggett is supervised by Mr. Jed E. Bandes. Mr. Bandes, as Owner and Chief Compliance Officer, monitors portfolios for investment objectives and other supervisory reviews and is responsible for all advice provided to clients. Mr. Bandes may be contacted at the phone number of the main office as shown on the cover page.

FINRA Series 66 Uniform Combined State Law Examination

The Series 66 exam — the NASAA Uniform Combined State Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 100 scored questions. Candidates have 150 minutes to complete the exam. In order for a candidate to pass the Series 66 Exam, he/she must correctly answer at least 73 of the 100 scored questions.

There is no prerequisite for the Series 66 examination. However, the Series 7 examination is a co-requisite to the Series 66 Examination.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website](#).

Mutual Trust Asset Management, Inc.

Form ADV Part 2B Brochure Supplement

Cover Page

Name of Supervised Person/IA Rep	Raman J. Singh
CRD #	5899381
Date of Last Revision	March 2020

Name of Registered Investment Advisor	Mutual Trust Asset Management, Inc. (MTAM)
Address	2963 Gulf to Bay Blvd, Suite 330
Phone Number	(727) 799-9922
Website Address	None

This Brochure Supplement provides information about Raman J. Singh that supplements the Mutual Trust Asset Management, Inc. brochure. You should have received a copy of that brochure. Please contact Raman, if you did not receive Mutual Trust Asset Management, Inc.'s brochure or if you have any questions about the contents of this supplement. Additional information about Raman is available on the SEC's website at: www.adviserinfo.sec.gov (Raman's CRD # 5899381)

I read, received and understand Form ADV.

Client Name

Date

Client Name

Date

Educational Background and Business Experience

Education and Business Background

Name: Raman J. Singh

Year of Birth: 1988

Education: University of Houston - Downtown

Business:

The Holland Group Retirement Wealth Advisors – 06/2018 – present

Mutual Trust Asset Management, Clearwater, FL, Registered Representative – 01/2020 – present

Northwestern Mutual Investment Services LLC – 02/2017 – 03/2018

Fidelity Investments – 08/2015 – 01/2017

AIG Financial Distributors – 10/2014 – 07/2015

Morgan Stanley – 03/2011 – 10/2014

Student – 01/2006 – 08/2012

ZT Wealth – 01/2010 – 02/2011

Professional Designations Qualifications

Series 66 Uniform Combined State Law Examination	2012
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Certified Financial Planner™	2016
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Insurance Licenses

Life, Health & Variable Annuities	2015
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Disciplinary Information

Supervised persons are required to report on Form ADV Part 2 B, if there are any legal or disciplinary events material to a client's or prospective client's evaluation of the supervised person and disclose all material facts regarding those events. Raman J. Singh has nothing to report.

Other Business Activities

Raman Singh is in the business of providing Investment Advisory Services and selling insurance. Selling insurance is not part of Raman's investment advisory activity and it is not related to his association with Mutual Trust Asset Management, Inc. nor is his insurance activities supervised by or the responsibility of Mutual Trust Asset Management, Inc. Investment advisory and insurance activities represent 90% of Raman's time and income.

Raman Singh is licensed with several life, health, and fixed annuity insurance companies. Insurance products offered by these companies may be recommended. If clients purchase these products through him, he will receive the normal commissions. Mutual Trust Asset Management, Inc. does not supervise the sale of, nor take responsibility for, the sale of any insurance related products. Thus, a conflict of interest exists between his interests and those of advisory clients. The client is under no obligation to purchase products recommended, or to purchase products through MTAM or through these insurance companies. We seek to mitigate any conflict by making recommendations in the best interest of the client.

Additional Compensation

(Please refer to the conflicts associated with the Additional Compensation in the section above titled Other Business Activities)

When appropriate Raman Singh will recommend insurance policies that pay commissions from the respective insurance companies.

The above additional compensation represents conflict of interest. MTAM Code of Ethics and internal policies require all recommendations place the interest of the client first. Accounts are reviewed on a regular basis to ensure compliance with the Code of Ethics and conflict of interest policies.

Supervision

Raman Singh formulates his own investment advice as an investment advisor. In that capacity, Raman Singh is supervised by Mr. Jed E. Bandes. Jed, as Owner and Chief Compliance Officer, monitors portfolios for investment objectives and other supervisory reviews and is responsible for all advice provided to clients. Jed may be contacted at the phone number of the main office as shown on the cover page.

FINRA Series 66 Uniform Combined State Law Examination

The Series 66 exam — the NASAA Uniform Combined State Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 100 scored questions. Candidates have 150 minutes to complete the exam. In order for a candidate to pass the Series 66 Exam, he/she must correctly answer at least 73 of the 100 scored questions.

There is no prerequisite for the Series 66 examination. However, the Series 7 examination is a co-requisite to the Series 66 Examination.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website](#).

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Life, Health & Variable Annuities Florida 2-15 license

An individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the same insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured's disability; and optional modes of settlement of proceeds of life insurance. Representing a health maintenance organization or, as to health insurance only, an insurer transacting health insurance; insurance against loss through sickness or accidental bodily injury.

Mutual Trust Asset Management, Inc.

Form ADV Part 2B Brochure Supplement

Cover Page

Name of Supervised Person/IA Rep	Steven Holland
CRD #	2171208
Date of Last Revision	March 2020

Name of Registered Investment Advisor	Mutual Trust Asset Management, Inc. (MTAM)
Address	2963 Gulf to Bay Blvd, Suite 330
Phone Number	(727) 799-9922
Website Address	None

This Brochure Supplement provides information about Steve Holland that supplements the Mutual Trust Asset Management, Inc. brochure. You should have received a copy of that brochure. Please contact Steve, if you did not receive Mutual Trust Asset Management, Inc.'s brochure or if you have any questions about the contents of this supplement. Additional information about Steve is available on the SEC's website at: www.adviserinfo.sec.gov (Steve's CRD # 2171208)

I read, received and understand Form ADV.

Client Name

Date

Client Name

Date

Educational Background and Business Experience

Education and Business Background

Name: Steve Holland

Year of Birth: 1960

Education: Wagner College

Business:

The Holland Group - 09/1994 – Present

Mutual Trust Asset Management, Clearwater, FL, Investment Adviser Representative - 09/20 – present

Mutual Trust Company of America Securities - 09/2005 – 02/2014

Veritrust Financial, LLC - 04/2002 -09/2005

Aragon Financial Services, Inc. - 03/1996 – 04/2002

Professional Designations Qualifications

FINRA Series 6 Investment Company Products/Variable Contracts Representative Examination	1992
FINRA Series 7 General Securities Representative Examination	2000
FINRA Series 65 Uniform Investment Advisor Law Examination	2012
FINRA Series 66 Uniform Combined State Law Examination	2012

Insurance Licenses

Life, Health & Variable Annuities	1990
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Please see below for the descriptions of the Designations/Examinations

Disciplinary Information

1. 5/4/2016: Florida Office of Financial Regulation: In or around the first quarter of 2014, Mr. Holland, as a Registered Representative of an affiliated company, Mutual Trust Company of America Securities, Inc. (“MTCOAS”), had a client submit a negative review about him to Angie’s List, a paid subscription-supported website containing crowdsourced reviews. Mr. Holland informed Angie’s List that such comments by a client, whether positive or negative, violated the terms of client’s agreement with MTCOAS and requested the comments be removed. In support of this request, Mr. Holland provided a copy of the client’s new account agreement with MTCOAS to Angie’s List, but failed to redact certain confidential information. The Florida Office of Financial Regulation (“OFR”) contended disclosure of the information without the client’s approval or consent violated a Florida regulation. So as not to incur further legal costs disputing OFR’s contention or defending a threatened enforcement action, Mr. Holland entered into a Stipulation and Consent Agreement by which he neither admitted nor denied OFR’s finding of the violation and agreed to pay an administrative fine of \$5,000. The fine has been paid pursuant to the terms of the Stipulation and Consent Agreement finalized in May 2016. No further action has been taken by OFR and Mr. Holland is licensed and is operating in good standing.

2. 11/29/2012: Florida Office of Financial Regulation: On 11/29/2012, the Office of Financial Regulation (“Office”) entered a final order adopting the stipulation and consent agreement in the matter of Mr. Holland (“Respondent”). Respondent neither admitted nor denied the findings but consented to the entry of findings by the office. The office found that Respondent violated Sections 517.161(1) (H) and Rule 69W-600.13 (1) (H) by violating NASD Conduct Rule 2210 governing communications with the public. Respondent agreed to cease and desist from any and all future violations of Chapter 517, F.S. and the administrative rules thereunder; and to pay and administrative fine in the amount of \$10,000.
3. 4/26/1994: Florida Division of Securities: Based on the State of Florida Department of Insurance Case NO. 06865-93-A (WFM) representative allegedly misrepresented Whole Life Insurance as a “Retirement Savings Plan”. Resolution: Consent. \$750 fine paid to the state.
4. 10/02/2006: Veritrust Financial: Allegations: Sale of unsuitable products in December of 2002 and 2003. Status: Settled. Settlement Amount: \$30,000
5. 1/12/2006: Veritrust Financial: Allegations: Unsuitable recommendations. Product Type: Annuities – variable. Status: Settled. Monetary Compensation Amount: \$50,000.
6. 6/21/2005: Veritrust Financial: Allegations: Unsuitable recommendations (annuities), negligence, breach of fiduciary duty. Status: Arbitration/Reparation Settled. Settlement Amount: \$85,000
7. 11/28/2004: Veritrust Financial: Allegations: Allegations of negligence (by [Customer’s] Attorney), breach of fiduciary duty and fraud. Attorney for (Customers) tries to document that his clients were unfamiliar with annuities and stocks. Clients invested prior to our first meeting over 90% in stock and owned two Annuities. They were seeking Aggressive Growth, not Income or Preservation of Principal. Status: Arbitration/Reparation, Settled. Monetary Compensation Amount: \$225,000.
8. 11/13/2001: Aragon Financial Services: Allegations of negligence and misrepresentation of Annuities. Clients claim that they were unfamiliar with annuities and annuities were not explained, however clients had an annuity prior to investing and received prospectus’s and all annuity information prior to investing. Status: Settled. Settlement Amount: \$45,000.

Other Business Activities

Steve Holland

Steve Holland is in the business of providing Investment Advisory Services and selling insurance. Selling insurance is not part of Steve’s investment advisory activity and it is not related to his association with Mutual Trust Asset Management, Inc. nor is his insurance activities supervised by or the responsibility of Mutual Trust Asset Management, Inc. Investment advisory and insurance activities represent 90% of Steve’s time and income.

Steve Holland is licensed with several life, health, and fixed annuity insurance companies. Insurance products offered by these companies may be recommended. If clients purchase these products through him, he will receive the normal commissions. Mutual Trust Asset Management, Inc. does not supervise the sale of, nor take responsibility for, the sale of any insurance related products. Thus, a conflict of interest exists between his interests and those of advisory clients. The client is under no obligation to

purchase products recommended, or to purchase products through MTAM or through these insurance companies. We seek to mitigate any conflict by making recommendations in the best interest of the client.

Additional Compensation

(Please refer the conflicts associated with the Additional Compensation in the section above titled Other Business Activities)

When appropriate Steven Holland will recommend insurance policies to the clients of MTAM that pay commissions from the respective insurance companies.

The above additional compensation represents conflict of interest. MTAM Code of Ethics and internal policies require all recommendations place the interest of the client first. Accounts are reviewed on a regular basis to ensure compliance with the Code of Ethics and conflict of interest policies.

Supervision

Steve Holland formulates his own investment advice. In that capacity, Steve Holland is supervised by Mr. Jed E. Bandes. Jed, as Owner and Chief Compliance Officer, monitors portfolios for investment objectives and other supervisory reviews and is responsible for all advice provided to clients. Jed may be contacted at the phone number of the main office as shown on the cover page.

Descriptions Designations/Examinations

FINRA Series 6 Investment Company Products/Variable Contracts Representative Examination

The Series 6 exam — the Investment Company and Variable Contracts Products Representative Qualification Examination (IR) — assesses the competency of an entry-level representative to perform their job as an investment company and variable contracts products representative.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of an investment company and variable contract products representative, including sales of mutual funds and variable annuities.

Candidates must pass the Securities Industry Essentials (SIE) exam and the Series 6 exam to obtain the Investment Company and Variable Contracts Products registration. For more information about the SIE and Series 6 exams, refer to FINRA Rule 1210 and FINRA Rule 1220(b)(7).

FINRA Series 7 General Securities Representative Examination

The Series 7 exam — the General Securities Representative Qualification Examination (GS) assesses the competency of an entry-level registered representative to perform their job as a general securities representative.

The exam measures the degree to which each candidate possesses the knowledge needed to perform the critical functions of a general securities representative, including sales of corporate securities, municipal securities, investment company securities, variable annuities, direct participation programs, options and government securities.

Candidates must pass the Securities Industry Essentials (SIE) exam and the Series 7 exam to obtain the General Securities Representative registration. For more information about the SIE and Series 7 exams, refer to FINRA Rule 1210 and FINRA Rule 1220(b)(2).

FINRA Series 65 Uniform Investment Advisor Law Examination

The Series 65 exam — the NASAA Investment Advisers Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 130 scored questions. Candidates have 180 minutes to complete the exam. In order for a candidate to pass the Series 65 exam, he/she must correctly answer at least 94 of the 130 scored questions.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website.](#)

FINRA Series 66 Uniform Combined State Law Examination

The Series 66 exam — the NASAA Uniform Combined State Law Examination — is a North American Securities Administrators Association (NASAA) exam administered by FINRA.

The exam consists of 100 scored questions. Candidates have 150 minutes to complete the exam. In order for a candidate to pass the Series 66 Exam, he/she must correctly answer at least 73 of the 100 scored questions.

There is no prerequisite for the Series 66 examination. However, the Series 7 examination is a co-requisite to the Series 66 Examination.

For additional information about this exam, including the content outline, please visit the exams page on the [NASAA website.](#)

Life, Health & Variable Annuities Florida 2-15 license

An individual representing an insurer as to life insurance and annuity contracts, including agents appointed to transact life insurance, fixed-dollar annuity contracts, or variable contracts by the same insurer. Annuity contracts, including, but not limited to, fixed or variable annuity contracts; the granting of endowment benefits, additional benefits in event of death or dismemberment by accident or accidental means, additional benefits in event of the insured's disability; and optional modes of settlement of proceeds of life insurance. Representing a health maintenance organization or, as to health insurance only, an insurer transacting health insurance; insurance against loss through sickness or accidental bodily injury.