

## **Form ADV : Part 2 A & B**

as of January 13, 2021

**Part 2A: The Brochure:** This brochure discloses information about the qualifications and business practices of the investment advisory firm named below for the benefit of its clients and prospective clients. Please note that the terms “registered investment adviser” or “registered” do not imply a certain level of skill or training. If the adviser uses a wrap fee program, it is found in Appendix 1. If you have any questions about the contents of this brochure, please contact us at the contacts given below.

### **2A: Brochure : Item 1 : Cover Page : for**

#### **VIA IV INVESTMENTS, LLC**

(f.k.a. Jeffrey Jacob Holland Investments, LLC)

[also: [viafour.com](http://viafour.com) and [wisefactors.com](http://wisefactors.com)]

1333 Burr Ridge Parkway, Suite 200

Burr Ridge, Illinois 60527

[crd # 121992]

Telephone : (630) 674-7226

or

Facsimile : 630-325-7249

Email : [jeff.holland@viaiv.com](mailto:jeff.holland@viaiv.com)

website : [www.viaiv.com](http://www.viaiv.com)

[viafour.com](http://viafour.com) / [wisefactors.com](http://wisefactors.com)

*Please note that this brochure has not been approved by the Securities & Exchange Commission or by any state securities authority. This firm is registered with one or more states; **registration does not mean approval or verification by those regulators**. More information about the firm is at Investment Adviser Public Disclosure : [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*

**2A: Brochure : Item 2: Material Changes** : *If we amend this disclosure brochure, we are to send you either a new copy of the brochure or at least this item 2 describing the changes made so you can decide if you want us to send you a complete, new copy. A summary of material changes is : \_\_\_\_\_ attached as an exhibit to or*  
*\_\_\_\_\_ **X** \_\_\_\_\_ included here as part of this updated brochure*

We have updated the assets under management for the annual updating amendment. This is not a material change.

**2A: Brochure : Item 3 : Table of Contents:** Information regarding this firm’s advisor business, in 19 items, that investment advisers must provide to prospective clients initially and to existing clients annually:

Item 1. <u>Cover</u>	The firm’s name, address, contact	Page 1
Item 2. : <u>Material Changes</u>	to the ADV	Page 1
Item 3. : <u>Table of Contents</u>		Pages 2-3
Item 4. : <u>This advisory firm’s business:</u>	services, assets; owners.	Page 4
Item 5 : <u>Fees and Compensation.</u>	.fee schedules	Pages 5-6
Item 6: <u>Performance-Based Fees &amp; Side-By-Side Management.</u>		Page 6
Item 7 : <u>Types of Clients.</u>	— & account requirements	Page 7
Item 8 : <u>Methods of Analysis, Investment Strategies; Risk of Loss.</u>		Pages 7-8

**Caution: Investing in securities involves risk of loss which a client must be able to bear.**

Item 9 : <u>Disciplinary Information.</u>	—Legal or disciplinary events relating to our firm to evaluate the integrity of our firm or its management persons.	Page 9
Item 10 : <u>Other Financial Industry Activities and Affiliations.</u>	. — Possible conflicts of interest and how they are addressed.	Page 10
Item 11. : <u>A Code of Ethics,</u>	summary; how to obtain a copy; Interest in client transactions or in investments we recommend; conflicts of interest	Page 11
Item 12.: <u>Brokerage Practices.</u>	: How we select a broker; conflicts of interest; “soft dollars”; directed brokerage; trading practices - aggregating trades.	Pages 14 – 16
Item 13.: <u>Reviews of Accounts&amp; Reports to Clients</u>		Page 16
Item 14.: <u>Client Referrals and Other Compensation.</u>	Solicitors, etc.	Page 16
Item 15. : <u>Custody.</u>		Page 17

Item 16.: <u>Investment Discretion</u> .	Page 17
Item 17. : <u>Voting Client Securities</u> .—Proxy voting practices. How to obtain a copy of our proxy voting policies & procedures.	Page 17
Item 18.: <u>Financial Information</u> .— Disclosure of material financial information.	Page 18
Item 19.: <u>State-registered</u> investment advisers : requirements	Page 20

Parts 2B for Mr. Holland, and Mr. Coyner, Members and advisor representatives

## 2A: Brochure : Items 4 – 19:

### Item 4. : This advisory firm's business

4. A. VIA IV INVESTMENTS, LLC (fka Jeffrey Jacob Holland Investments, LLC [IRS EIN :57-1231140]) - also "the advisor" or "the firm" – was formed 11.29.2005, registered with the State of ILLINOIS on January 24, 2003. Mr. Holland is the firm's 50% owner, a member and is an advisory representative. Mr. Jeffrey Coyner is a 50% member (01.2016). The firm was re-registered as an ILLINOIS state registrant on 11.28.2017.

4.B. The firm offers clients portfolio management services on a continual and ongoing basis and on an occasional basis, as clients may desire. Portfolio management services are discretionary. The firm does not provide financial planning services per se. Mr. Holland can give general financial advice. We primarily recommend no-load mutual funds and ETFs, but are prepared to provide advice on most types of securities.

We offer four exceptionally-diversified, non-speculative, custom-indexed portfolios we have designed to seek to achieve sustained superior performance with reduced investment risk. Individual portfolios are weighted according to risk level, using asset classes: U. S. Large, Mid Cap, and Small Companies, International Large and Small Companies, Emerging Markets, U. S. and International Real Estate Investment Trusts, Cash, and U. S. Treasury Bonds (current allocations available upon request).

Under the dba, "WiseFactors" we offer a digital advisor that creates portfolios using mutual funds and ETFs.

4.B. The firm also offers to suitable clients who can invest \$10,000 or more participation in a "robo" investment program online; we have named this program "Viafour." VIA IV clients who wish to use the online investment program will fill out an online risk tolerance questionnaire. We provide portfolios that match the questionnaire results. The program is not self-directing: Viafour has discretion over the account. The custodian of the account is TD Ameritrade. We offer an internet (digital) advice service at the address: wisefactors.com. This product site specializes exclusively in DFA Mutual Funds. DFA has its own mutual fund fees.

4.B. We offer investment in Blackstone alternative products, suitable only for \*accredited investors. We will require clients to sign an acknowledgement that they understand that these investments do not comprise a diversified portfolio, are less liquid and run a higher risk of loss. Clients will manage the portfolio themselves. [\* An "accredited investor" (SEC Rule 501, Regulation D (§230.500 *et seq.* ) "(a) ...shall mean any person who comes within any of the following categories, or who the issuer reasonably believes comes within any of the following categories, at the time of the sale of the securities to that person: ... (5) Any natural person whose individual net worth, or joint net worth with that person's spouse, exceeds \$1,000,000. / (A) The person's primary residence shall not be included as an asset;..." among others.

4.C. Advisory services tailored to each client's individual needs: As a fiduciary, an investment adviser is to make only those recommendations that demonstrably are in each client's own best interests, which means they must be based on an individual's stated and/ or established, individual needs, goals, risk tolerance and investment time horizon. The firm seeks to establish this personal dimension through a careful, fact-finding interview and discussions with each client. VIA IV pays an experienced, registered outside adviser, J. P. Maguire, to obtain advice for 401K plan portfolios.

Clients may impose reasonable restrictions on the adviser's discretion to invest in certain securities or types of securities if a client provides clear, written directions to that effect. A client's ability to impose restrictions on the adviser's discretion occurs at the beginning of the process at which time a client accepts or chooses not to invest in the recommended programs. Clients may withdraw from the programs at any time as well. .

4.D. This firm does not use any wrap fee program.

4. E. As of 12/31/2020, this firm managed assets of \$126,758,000 in a continuous and regular manner. 312 accounts are discretionary; 132 accounts are non-discretionary.

## Item 5 : Fees and Compensation. . — How our firm is compensated

### 5.A. A description of the range of fees

From December 2017, the VIA IV maximum fee for clients of Scott Mann is 1.50% for all portfolios he manages, making VIA IV's maximum fee total 1.85%. Otherwise, VIA Four's annual fee is the percentage of the assets under management shown below:

- 0.90 % maximum for portfolios under \$500,000
- 0.80 % for assets between \$500,000 and \$1,000,000
- 0.70% for assets between \$1 million and \$2 million
- 0.60% for assets between \$2 million and \$4 million
- 0.50% for assets over \$4 million.

Clients pay the fee monthly in arrears. If a client closes an account prior to a month's end, the client will pay no fee for that month. The advisory fee is separate from any fees that the portfolio's asset class charges. The percentage is negotiable at the adviser's sole discretion, based on the adviser's relationship to the client and perception of the management difficulties involved.

2017.12.20: the 1.50% fee applies to all new clients of Scott Mann.

Mutual Funds and ETF's (Exchange Traded Funds) have separate fee schedules distinct from the above advisory fee to be charged by the investment advisory firm. Typically, the advisor will combine these classes to construct a client portfolio. The fee will be 1.00% or less. In the unlikely event, that the custodian charges for ETF's in the future, the customer will be responsible for those fees.

"Viafour" the "robo" investment program charges an annualized fee of 0.25% of the invested assets, billed monthly by the custodian, TD Ameritrade, and paid to the adviser. ETF fees are separate and in addition to Viafour's fees. Clients who use our internet (digital) service site "WiseFactors.com" will pay an annual fee of 0.50% of the assets invested (in DFA mutual funds, and ETFs, exclusively). DFA has its own mutual fund fees.

5.B. . Disclosure : Does our firm bill its clients for the incurred advisory fees by sending an invoice to the client, OR by obtaining each client's signed permission to deduct the advisory fees from the client's account held by the custodian? May clients select either method of billing? VIA IV INVESTMENTS, LLC charges its clients for its services by "direct billing," (charging its fees to a client's account). We do not send invoices to clients; we charge our advisory fee monthly in arrears for 1/12<sup>th</sup> of the annual fee - a minimum of 0.05208% of the assets under management.

5.C. Other types of fees or expenses clients may pay in connection with the advisory services. Clients should be aware that opening an investment account carries with it costs beyond the advisory fee(s) our firm charges. When placing a transaction order to buy or sell securities, clients may have to pay any or all of the following charges in addition to the advisory fees charged by this firm.

- Brokerage commissions
- custodian fees
- postage charges
- processing charges
- Ticket charges
- Early surrender
- Transfer fees
- administrative fees for investments in mutual fund fees,
- and 12b-1 fees in addition to administrative fees, and other marketing fees for mutual funds, paid to a broker dealer;
- broker dealer account maintenance fees for accounts, especially if inactive.

The custodian typically charges a fee of \$40 for mutual funds and \$20 for ETFs. The custodian also charges a starting and rebalancing fee of \$350. We direct clients to this brochure's Item 12 for further discussion of brokerage costs.

5.D. . Do clients pay fees in advance? How may a client obtain a refund of a pre-paid fee if the contract is terminated prior to a billed period's end? The firm charges its advisory monthly in arrears; refunds do not apply.

5.E. Disclosure : Mr. Holland is not also a broker dealer agent; therefore he cannot receive commissions for brokerage transactions.

Disclosure 5.E.1. Whenever an investment advisory firm's representatives may earn a commission, or mutual fund management 12b-1 fees, or other forms of sales charges in their capacity as the registered representatives of a broker-dealer, that arrangement creates an incentive to recommend those sales and, as a consequence, an inherent possibility for a conflict of interest. An advisor is a fiduciary who is required to make only those recommendations for a client that solely are in the client's own best interest, uninfluenced by any calculation of personal gain. Mr. Holland is not also a broker dealer agent; therefore he cannot receive 12(b)-1 fees.

Disclosures 5.E.2-4 Clients always have the option to purchase through unaffiliated broker-dealers and their agents those investment products our firm recommends. Our firm does not receive more than half its revenue from commissions and other sales-based compensation. Our firm's only business activity is its fee-based advisory service. We do not charge commissions or markups. Our firm recommends primarily mutual funds or ETFs to our clients; they include "no-load" funds only, which impose no commission or sales charge ("load") on the shareholder and are purchased directly from the fund company, rather than through a broker.

#### **Item 6.:Performance-Based Fees and Side-By-Side Management.**

For Qualified Clients VIA IV will agree to manage a portfolio for a Performance Fee. In this agreed upon fee we reduce our normal fee by 50%; if our VIAIV 85 portfolio \* 1.15 then exceeds the sp500 in a calendar year, we will charge 1.5 times our normal fee. NOTE: Regulators have stated that performance fees can cause incentives for an adviser to manage a portfolio with an eye to short term gains only, including investments that are more speculative or have a higher risk of loss. They may also tempt an advisor to allocate more time to them than to other clients' portfolios due to the possibility of a higher fee. As a fiduciary, an investment adviser is to provide equitable treatment to each client's managed portfolio as if it were the adviser's own portfolio - within the investment parameters agreed to with the client.

Item 7. : Types of Clients.

The types of advisory clients we service; requirements for opening or maintaining an account.

Typically our clients include high net worth and other individuals. The advisor is prepared to provide services to corporations and other businesses, charitable organizations, estates, and trusts as well.

The firm generally requires a minimum dollar amount of \$250,000 (two hundred and fifty thousand dollars) in client assets to open an investment management portfolio. This minimum is negotiable at the adviser's discretion, based on such considerations as prior or anticipated future relationship.

Item 8. : Methods of Analysis, Investment Strategies and Risk of Loss.

A. An adviser must describe its methods of analysis and investment strategies used in formulating its investment advice. It must explain in detail any unusual risks. **Caution : Investing in securities involves risk of loss.**

An adviser must explain the material risks involved for each significant investment strategy or method of analysis used and particular type of security recommended, with more detail if those risks are significant or unusual (i.e., not otherwise apparent from reading the Brochure). A strategy or method of analysis is significant if the adviser uses the strategy or method in advising "more than a small portion of the adviser's clients' assets."

The firm will combine multiple asset classes in a globally diversified portfolio, and rebalance as needed. Besides a possible loss of capital (past performance is no guarantee of future profits) in the variety or spread of choices, meant to moderate losses, diversification may not be sufficient to counter a broadly falling market. In formulating our investment advice, the firm uses financial newspapers and magazines and other research prepared by outside sources, to include Dimensional Fund Advisors.

8. B. An advisor must explain the material risks involved in frequent trading if its strategy involves frequent trading of securities. An advisor must explain how frequent trading can affect performance. An adviser is not required to discuss its cash balance practices.

What may be regarded as "frequent trading" varies according to

- the client and the strategy for that client's specific account – one client may have multiple accounts that apply different strategies
- to the type of security or relative mix of securities involved
- and to the current nature of the market.

The firm's own trading strategies include holding for the long term (a year or more) and possible short term investments (traded within a year).

All these strategies are intended to enhance the portfolio's value and ability to meet a client's stated goals. What may be regarded as "frequent trading" varies according to both client and to the type of security involved. All trades will add some costs to be deducted from a client's account and could reduce the overall return or growth in a client's account, if carefully measured against what its value would have been had the adviser not placed the transactions.

VIA IV pays an experienced, registered outside adviser, J. P. Maguire, to obtain additional advice for 401K plan portfolios.

8.C. Do we recommend primarily a particular type of security? What are the material risks involved with that type of security? Are those risks unusual or significant? We primarily recommend no-load mutual funds and ETFs. We are prepared to provide advice on most types of securities :

<u>Equity Securities</u>	Notable risks involved with this type of investment
exchange-listed securities	Market fluctuations can bring losses, lower dividends
over-the-counter securities	More susceptible to market fluctuations; higher risk
foreign issuers	May not be subject to US standards of financial reporting; higher risk
Corporate debt securities	Same as exchange listed, corporate bonds involve credit risk
Commercial paper	Same as OTC
Certificates of deposit	Limited liquidity
Municipal securities	Same as exchange listed; It is possible that they can default
Investment company securities	
variable life insurance	Insurance company could go out of business; the value of the subaccounts are subject to market fluctuation and loss
mutual fund shares	Market fluctuations can bring losses; various fees
US government securities	Returns can be low or even, rarely, negative. As hedge against equity market risk, mirror them.



Item 9 :Disciplinary Information.

What facts about any legal or disciplinary event involving our firm or its personnel should you know of, because it is material to an evaluation of the integrity of our firm or its management persons?

The SEC requires that we inform you, our client, if our firm or any of our management persons has been involved in any of the events listed below in 9. A, B, and C. and, beyond those points, if there is any material fact about any legal or disciplinary event that you should know about in order to evaluate our integrity. You may also see these same questions answered online at the investment adviser public disclosure site (IAPD), in Part 1A, Item 11.

**Has our firm or any of our management persons been involved in :**

9. A. A criminal or civil action in a domestic, foreign or military court of competent jurisdiction in which our firm or a management person

1. was convicted of, or pled guilty or *nolo contendere* ("no contest") to

(a) any felony? **No, our firm has not and no one in our firm has been.**

(b) a misdemeanor that involved investments or an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion? **No, our firm has not and no one in our firm has been.** or

(c) a conspiracy to commit any of these offenses? **No, our firm has not and no one in our firm has been.**

2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses? **No, our firm has not and no one in our firm has been.**

3. was found to have been involved in a violation of an investment-related statute or regulation? **No, our firm has not and no one in our firm has been.** or

4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, our firm or a management person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order? **No, our firm has not and no one in our firm has been.**

9. B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which our firm or a management person -

1. was found to have caused an investment-related business to lose its authorization to do business? **No, our firm has not and no one in our firm has been.** or

2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority

(a) denying, suspending, or revoking the authorization of your firm or a management person to act in an investment-related business? **No, our firm has not and no one in our firm has been.**

(b) barring or suspending our firm's or a management person's association with an investment-related business? **No, our firm has not and no one in our firm has been.**

(c) otherwise significantly limiting our firm's or a management person's investment-related activities? **No, our firm has not and no one in our firm has been.** or

(d) imposing a civil money penalty of more than \$2,500 on our firm or a management person? **No, our firm has not and no one in our firm has been.**

9. C. A self-regulatory organization (SRO) proceeding in which our firm or a management person

1. was found to have caused an investment-related business to lose its authorization to do business? **No, our firm has not and no one in our firm has been.** or

2. was found to have been involved in a violation of the SRO's rules and was:

(i) barred or suspended from membership or from association with other members, or was expelled from membership? **No, our firm has not and no one in our firm has been.;**

(ii) otherwise significantly limited from investment-related activities? **No, our firm has not and no one in our firm has been.** or

(iii) fined more than \$2,500 - **No, our firm has not and no one in our firm has been..**

#### Item 10 :Other Financial Industry Activities and Affiliations.

What material relationships does our firm or any of our management persons have with related financial industry participants? What material conflicts of interest may arise from these relationships and how are these conflicts addressed?

A. Have we, or has any of our management persons, registered either as a broker-dealer or as the representative of a broker-dealer? / OR, Do we or any management person have such a registration pending?

NO. This question does not apply to our firm.

B. Have we, or has any of our management persons, registered as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of any of these entities named here? OR, Do we or any management person have such a registration pending?

NO, none of this item applies to our firm.

C. Do we have any "related person" – a person or a firm that we control or that controls us through ownership or as an officer – with whom we have a material relationship, any

arrangement that may cause a conflict of interest when providing our clients with investment advice? No. This firm has no related person who is a(n) :

1. broker-dealer, municipal securities dealer, or government securities dealer or broker
2. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. other investment adviser or financial planner
4. futures commission merchant, commodity pool operator, or commodity trading advisor
5. banking or thrift institution
6. accountant or accounting firm
7. lawyer or law firm
8. insurance company or agency
9. pension consultant
10. real estate broker or dealer
11. sponsor or syndicator of limited partnerships.

VIA IV pays an experienced, registered outside adviser, J. P. Maguire, to obtain additional advice for 401K plan portfolios. VIA IV is not related to Mr. Maguire.

D. Do we recommend or select other investment advisers for our clients? We do not normally do so.[If an adviser selects or recommends other advisers for clients, the adviser must disclose any compensation arrangements or other business relationships between the advisory firms that create material conflicts of interest between the adviser and its clients along with a discussion of the conflicts and how they are addressed.]

Do we receive compensation from those other advisers for our referrals? No.

Do we have any other business relationships with these advisers that also could cause a conflict of interest and, if "yes," how do we address them? We do not.

Item 11. Code of Ethics / Advisory Persons' own trading and possible personal interest in our clients' trades.

A. As required by SEC rule 204A-1 or similar state rules our firm has adopted a Code of Ethics.

Our firm's Code of Ethics describes our policies and procedures to abide by the law's prohibition against insider trading, including our reviews of our own persons' trades, and other ethical considerations. We will provide you, our client or potential client, a copy of our Code of Ethics if you write to us requesting one.

Please note that using any insider information, information that is not readily available to all participants in the securities markets (upon making a reasonable effort to obtain that information), for any person, ourselves or relatives or clients or any other person, is strictly illegal and punishable by fines and imprisonment.

**How our firm controls sensitive information:**

- Building security :doors are locked when no one is present.
- locked office doors
- locked cabinet files
- password protected computer screens and databases
- fire prevention equipment
- office area under continual supervision.

11. B. [ also in Form ADV Part 1A, Item 8. (1)(2) (3) ] : Does our firm or a related person recommend to our clients, or do we buy or sell for our clients' accounts, securities in which we or a related person has a material interest?

Our firm and/ or its associates **do**

- buy or sell for the firm or for themselves shares of mutual funds that we also recommend to our advisory clients;
- invest or are permitted to invest in securities related to those we may recommend to clients.

Our firm and its associates **do not**

- buy securities for the firm or for themselves from advisory clients (principal transactions);
- sell securities the firm or its associates own to advisory clients (principal transactions);
- in their capacity as a broker/ dealer agent, transact purchases or sales of any client's securities directly to any other person (an "agency cross transaction" that side-steps using a securities market place)
- buy or sell for the firm or for themselves securities (other than shares of mutual funds) that we also recommend to our advisory clients;
- invest in derivatives
- recommend securities (or other investment products) to our advisory clients in which our firm or any person or other firm related to our firm has some other proprietary (ownership) or other financial interest.
- Act as an investment adviser to an investment company that we recommend to our clients.

Disclosure is not required for securities that are not "reportable securities" (such as shares in unaffiliated mutual funds). This summary should provide enough information for the client to determine if it would like to read the full code of ethics and to understand generally the adviser's ethical culture and standards.

11. C. **Personal Trading.** : investing in the same or related securities : Does our firm permit itself, its personnel, or a person related to our firm (by ownership or other forms of control) to invest in the same securities that we recommend to our clients, or in securities that are related to those securities, such as options or other derivatives?

Yes, we do allow it. The firm or its associates may buy or sell similar index / mutual fund products. Records of these holdings will be maintained in the advisor's offices for review by the regulator. The advisor is well aware of the prohibitions against the use of any insider information and that it must maintain written policies and procedures reasonable designed to guard against the abuse of such information.

When our firm or its personnel buy or sell securities for their own accounts, we place clients' orders before our own. We do not aggregate or "bunch" our orders with clients' orders. These guidelines are self-imposed; Mr. Holland is the only person affected.

The possible conflicts of interest that arise whenever we recommend, or, in our discretion, buy or sell for you a security that we may also buy or sell for ourselves are

- using your order's market effect to benefit ourselves ("front running");
- using your order as "inside information" that would give us an unfair advantage in the markets to benefit ourselves or any other person (which is an illegal act);
- gaining a lower brokerage cost for ourselves in bunching orders, which can create an incentive to involve your account in that transaction.

Does any person in our firm participate in or have an interest in our clients' transactions? How does such a person participate or what is the interest and what conflicts of interest can that create?

No one in the firm has a financial interest in any investment transaction the firm recommends to its clients. Examples of such interests would include an adviser recommending that clients invest in a pooled investment vehicle that the firm advises or for which the investment adviser serves as the general partner, or when an adviser with a material financial interest in a company recommends that a client buy shares of that company.

["Participation or interest in Client Transactions" means the adviser or a related person recommends to clients, or buys or sells for client accounts, securities in which the adviser or a related person has a material financial interest.] SEC NOTE : Conflicts could arise if an adviser recommends that clients invest in a pooled investment vehicle that the firm advises or for which it serves as the general partner, or when an adviser with a material financial interest in a company recommends that a client buy shares of that company.

11. D. **Personal Trading** : investing in the same or related securities at the same time.

What specific conflicts do we have when our firm or a related person trades in the same securities at or about the **same time** as it places trades for a client's account? Our practice is to place client orders first. Client orders are for mutual funds and ETFs.

“The SEC generally dislikes ‘contemporaneous’ trading,” that is, that anyone in our firm might enter an order for her or his own account at the same time as an order in the same security for a client. Note that these restrictions are not applied to investments in mutual funds that are unaffiliated with our firm. Unaffiliated means a mutual fund that we have not ourselves created or helped establish and/ or in some way act as the fund’s managers.

The SEC has stated that “an adviser’s ability to place its own trades before or after client trades in the same security may affect the objectivity of the adviser’s recommendations” and therefore states further that the SEC believes *disclosure of this practice* is warranted. The SEC has not in that opinion stated a specific length of time before or after. In that respect it could also be noted conversely that clients might have reservations in employing an adviser who does not invest in the same securities the adviser recommends.

What internal controls do we have to prevent our firm and/ or our staff from buying or selling the same or related securities at the same time as we may be placing orders for our clients’ accounts? It is a self-imposed, self-control Mr. Holland practices. Front running is not possible with ETFs and mutual funds.

#### Item 12 :Brokerage Practices. Recommended broker dealer

12. A. Does our firm select a broker/ dealer for you? On what basis do we do so? How do we determine the reasonableness of the broker’s compensation (commission charges)?

We do recommend Fidelity to be the broker-dealer and its custodian for our clients’ transactions. Fidelity is the only brokerage our firm uses. Fidelity offers good online services, 24/7 and a large choice of mutual funds and ETFs. The advisor is aware that it has a fiduciary duty to obtain best brokerage for the client, which may not always mean the lowest brokerage costs.

12. A. 1. Research and other “Soft Dollar” benefits :  
Do we have any conflicts of interest such as receiving “soft dollars” from the broker/ dealer? No, we do not receive any soft dollars, including research, whether the broker’s own or from a third party source.

#### Required disclosures / explanations:

- a. If an adviser uses client brokerage commissions (or markups or markdowns) to obtain research or other products or services, the adviser receives a benefit in not having to produce or purchase them itself.
- b. Any such benefit creates an incentive to select or recommend the broker-dealer that provides it; an adviser’s duty is to select a broker-dealer based on the most favorable execution services for the adviser’s clients.

[c.] Do we “pay up” to obtain soft dollar benefits (that is, do we pay more than the lowest available commission rate)? Do we make our clients pay commissions (or markup or markdowns) higher than those charged by other broker-dealers in return for “paying-up”? No.

[d.] Do we use soft dollar products, research or other items for the benefit of all our clients or only certain clients? Do we allocate benefits proportionately to accounts as those accounts generate the soft dollars by our directing brokerage to a specific broker-dealer? NO. These considerations do not apply to this firm.

[e.] The types of products, services or other benefits our firm or any of its related persons acquired in our firm’s last fiscal year due to directing our clients’ brokerage to Fidelity are : *[not applicable]*.

[f.] The procedures our firm used during its last fiscal year to direct our clients’ transactions to a particular broker-dealer in return for soft dollar benefits received were : *none*

Clients need to understand that “soft dollars” are an enticing benefit for an adviser in so far as they provide access to research and / or other products both of use to the adviser in its business and at no expense to the adviser. Clearly, such an enticement creates an incentive to use the broker-dealer in question and may cause the adviser to use a broker that charges the adviser’s clients higher commission rates than another broker-dealer.

An adviser has a duty to seek the best execution of trades for its clients, which includes considerations in addition to the commission rate, however.

Are there additional, material conflicts of interest involved in our use of directed brokerage, due to a relationship with the broker-dealer? No.

12. A. 2. Brokerage for client referrals :Do we direct brokerage to a specific broker-dealer in return for client referrals either to our firm or to a related firm? *[includes referrals from a BD or other third party.]*No, we do not.

The inherent conflict of interest in this practice stems from an adviser’s fiduciary duty to the client to put the client’s interests first. The referrals create an incentive to use the broker-dealer not for the services a client will receive, but due to the benefit to the advisory firm. Directed brokerage may result in brokerage costs that are higher than a client might obtain from another broker-dealer.

What procedures did we use during our last fiscal year to direct brokerage to Fidelity were : we use only Fidelity, for other reasons.

12. A. 3. [a] Do we “routinely recommend, request or require” our clients to direct brokerage? [describe the practice/ policy]

Our firm uses only Fidelity for brokerage. Generally, any client who does not want to use Fidelity should use a different adviser. The exception would be a client of sufficient portfolio magnitude to justify reworking the adviser’s forms and other practices. Clients should know that not all advisers do require directed brokerage.

Is the broker-dealer in question an affiliate of our firm or have some other economic relationship? No. By directing brokerage we may not be able to achieve the most favorable execution for client transactions, at an increased cost to our clients than they might have incurred with another broker-dealer.

[b] Do we permit a client to direct brokerage to a specific broker-dealer? Generally: No.. Our practice is to use Fidelity. Clients should understand that their choice of broker-dealer may lead to higher brokerage costs than they might have otherwise obtained, due to higher rates or an inability to aggregate orders and thereby reduce transaction costs.

12. B. When we place orders with a broker/ dealer for our clients, do we aggregate or “bunch” your trade order with orders for other clients? We do not; the securities involved are mutual funds and ETFs.

Item 13 :Review of Accounts.

13. A. Does someone in our firm review your investment account portfolio and how often? Jeff Holland will review accounts yearly or on an as-needed basis. Jeff Holland, member, will maintain all reviews.

- Accounts of less than \$1 million in assets we review at least annually
- Accounts of \$1 million or more we review at least quarterly

13. B. What factors might trigger a review in addition to our periodic reviews? If a client wants an additional review, the firm will provide one.

13. C. What regular reports do we or others provide you? Are they written reports? What do they contain? The account custodian, Fidelity, will provide written quarterly statements.

Item 14 :Client Referrals and Other Compensation.

A. Does someone other than a client of our firm pay our firm or related persons, or otherwise provide some economic benefit to our firm, for the investment advice we provide to our clients? [12b-1 fees; other; sales awards or prizes] Our firm does not receive any such benefits.



B. Does our firm or a firm related to us through some form of ownership pay someone, directly or indirectly, for client referrals? No. We do not. [ An adviser must describe arrangements through which it or a related person compensates someone for client referrals, and describe the compensation. An adviser must also disclose any economic benefit received (including sales awards or prizes) from a non-client for providing advisory services to clients, and discuss conflicts of interest that arise from this practice and how they are addressed.]

Item 15: Custody.

Does our firm have custody of your assets? No, except that the firm of VIA IV INVESTMENTS, LLC does practice “direct billing” to the account custodian. While being defined as custody, it does not carry any requirement for annual audits and is not to be marked on the ADV Part 1A as custody.

The qualified custodian(s) of our clients’ accounts is **Fidelity**.

The custodian will send to you a quarterly and/or monthly financial statement. NOTE : These statements should be reviewed carefully. It is not the custodian’s responsibility to ascertain the accuracy of the calculation for fees subtracted from your account.

Item 16 :Investment Discretion.

A. Does our firm have discretionary authority over your assets? Our firm does seek to exercise discretion over its clients’ accounts.

B. What limitations are there, or can you place, on our discretionary authority? Suitability parameters, as the client and the adviser establish in the initial interview, are the over-riding limitation on any discretion.

Discretionary control : Clients will be asked to sign an agreement to allow the advisor limited power of attorney to place transactions on the client’s behalf on a discretionary basis.

Item 17. : Voting Client Securities..— proxy voting practices

A. Does our firm have or will it accept authority to vote client securities? No.

B. This is our policy and our procedures : that we do not vote proxies. Our firm does not vote its clients’ proxies. We state this in our agreement and here in these

disclosures. Our firm urges our clients to read and participate in the voting process tied to the shares they own in various companies as an excellent means for our clients to become familiar with those companies in which they are invested.

Item 18 :Financial Information.

A. Custody situations :Does our firm have custody of your funds or your securities investments? No, other than the practice of direct billing.

- Do we require prepayment of a fee of \$500 (\$1200 for an SEC registrant) or more, 6 or more months in advance of services? We do not.
- Do we practice “Direct Billing” (charging our fees to your account)? Yes, we do.
- Do we or someone in our firm act as the trustee for an advisory client? No, we do not.

18. B. Financial difficulties : If our firm has discretionary authority over your assets [see Item 16] or custody of our clients’ securities or funds, or require or solicit prepayment of fees of \$1,200 or more (for SEC registrants, but only \$500 or more for state registrants), six or more months in advance, then we must disclose if there is any financial condition reasonable likely to impair our firm’s ability to meet its contractual commitments to its clients.

Does our firm have any financial condition that could reasonably seem likely to impair our ability to meet our contractual commitments to you, our client? This question is important, especially if an investment adviser has discretion, custody or both; if our financial condition were precarious, our clients would be exposed to increased risks that we might not manage their assets properly, according to the SEC. Prepaid fees might not be refunded if an advisory firm were to cease being able to do business due to insolvency. No, it does not.

The SEC cautions advisers that their fiduciary duty of full and fair disclosure may require them to continue to disclose any precarious financial condition promptly to *all* clients, even clients to whom they may not be required to deliver a brochure or amended brochure. If an adviser has discretionary authority over client assets, has custody of client funds or securities, or meets certain other requirements, then the adviser must disclose any financial condition reasonably likely to impair the adviser’s ability to meet contractual commitments to clients. An adviser must also disclose if it was the subject of a bankruptcy petition during the past 10 years.

18. C. We must also disclose if our firm has been the subject of a bankruptcy in the past 10 years. Has our firm been the subject of a bankruptcy petition during the last 10 years? No, it has not.

Item 19: State Registrant Information.

- A. We have identified our principal executive officer and management persons: Mr. Holland in Item 4.A. above and the Part 2B, attached, following. Mr. Jeffrey R. Coyner became a 50% member in January 2016. His information is also found in the Part 2B that follows this Item 19.
- B. Mr. Holland has no other business in which he is actively engaged (other than giving investment advice).
- C. Neither Mr. Holland, Mr. Coyner nor the firm charges or receives a performance fee. Clients should understand that performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.
- D. Neither Mr. Holland nor his firm has been involved in one of the events listed below:
1. An award or otherwise being *found* liable in an arbitration claim alleging damages in excess of \$2,500, *involving* any of the following:
    - (a) an investment or an *investment-related* business or activity;
    - (b) fraud, false statement(s), or omissions;
    - (c) theft, embezzlement, or other wrongful taking of property;
    - (d) bribery, forgery, counterfeiting, or extortion; or
    - (e) dishonest, unfair, or unethical practices.
  2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative *proceeding involving* any of the following:
    - (a) an investment or an *investment-related* business or activity;
    - (b) fraud, false statement(s), or omissions;
    - (c) theft, embezzlement, or other wrongful taking of property;
    - (d) bribery, forgery, counterfeiting, or extortion; or
    - (e) dishonest, unfair, or unethical practices.
- E. Neither Mr. Holland, nor Mr. Coyner, nor the firm has any relationship or arrangement with any issuer of securities.

**Part 2B: The Brochure Supplement** :Here we provide information about advisory personnel on whom you rely for investment advice. We must provide this supervised person's supplement to you, our client initially at or before the time when *that* specific supervised person begins to provide you with advisory services.

**Item 1. Cover Page.**

VIA IV INVESTMENTS, LLC  
1333 Burr Ridge Parkway, Suite 200  
Burr Ridge, Illinois 60527

[crd # 121992]

Telephone : (630) 674-7226                      or                      Facsimile : 630-325-7249

Email : [jeffreyjh7@gmail.com](mailto:jeffreyjh7@gmail.com)                      website : [www.viaiv.com](http://www.viaiv.com)

This brochure supplement provides information Mr. Jeffrey J. Holland that supplements the disclosure brochure for VIA IV INVESTMENTS, LLC. You should have received a copy of that brochure. Please contact Mr. Holland if you did not that brochure or if you have any questions about the contents of this supplement. Additional information about Mr. Holland is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Jeffrey J. Holland**

Year of birth : 1963

CRD # 2349981

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

College : BS, Miami University

11.7.2002 Passed the Series 65 examination

**Business Background** past 6 years

VIA IV INVESTMENTS, LLC (fka) Jeffrey Jacob Holland Investments, LLC, owner and adviser, and continuing scientific research of capital markets; Options trading & financial research

**Item 3. Disciplinary Information.** Item 3 requires disclosure of any legal or disciplinary event that is material to a client's evaluation of the supervised person's integrity. The Commission presumes certain disciplinary events are material to such an evaluation if they occurred during the last ten years.

At the Investment Adviser Public Disclosure site, the public may read, regarding Mr. Holland : "This Investment Adviser Representative is currently registered in **1** jurisdiction. Is this Investment Adviser Representative currently suspended with any jurisdiction? **No**"

"Are there events disclosed about this Investment Adviser Representative? **No**"

Mr. Holland has no disclosures to make under this item. Disclosure of any event for which the supervised person had ever resigned or otherwise relinquished a professional attainment, designation or license in anticipation of it being suspended or revoked (other than for suspensions or revocations for failure to pay membership dues).

Item 4. Other Business Activities. Item 4 requires an adviser to describe other business activities of its supervised persons. The item specifically requires disclosure with respect to other capacities in which the supervised person participates in any investment-related business

No other business activities, other than personal trading and research.

Disclose any material conflicts of interest such participation may create. In addition, the item requires the supplement to include information about any compensation, including bonuses and non-cash compensation, the supervised person receives based on the sales of securities or other investment products, as well as an explanation of the incentives this type of compensation creates. The SEC requires disclosure of *other* business activities or occupations that the supervised person engages in if they involve a substantial amount of time or pay. Clients may have different expectations of an individual whose sole business is providing investment advice than of an individual who is engaged in other substantial business activities.

Item 5. Additional Compensation. This item requires that the supplement describe arrangements in which someone other than a client gives the supervised person an economic benefit (such as a sales award or other prize) for providing advisory services. No other compensation.

Item 6. Supervision. This item requires an adviser to explain how the firm monitors the advice provided by the supervised person addressed in the brochure supplement. It also requires a firm to provide the client with the name, title, and telephone number of the person responsible for supervising the advisory activities of the supervised person.

Mr. Holland is his own supervisor. He maintains on file in the firm's offices reports of his proprietary trading activities and the formulation of his recommendations for the regulator to review at will. Mr. Coyner reviews Mr. Holland's proprietary trading activities.

Item 7. State Registration requirements Mr. Holland maintains his registration as an advisory representative with his firm with the State of ILLINOIS. None of the disciplinary or regulatory items under this section applies to Mr. Holland. He has not declared bankruptcy in the past 10 years.

---

## **Part 2B: The Brochure Supplement :**

Here we provide information about advisory personnel on whom you rely for investment advice. We must provide this supervised person's supplement to you, our client initially at or before the time when *that* specific supervised person begins to provide you with advisory services.

**VIA IV INVESTMENTS, LLC**  
(f.k.a. Jeffrey Jacob Holland Investments, LLC)  
1333 Burr Ridge Parkway  
Burr Ridge, Illinois 60527

[crd # 121992]

Telephone : (630) 674-7226  
Email : [jeff.holland@viaiv.com](mailto:jeff.holland@viaiv.com)

or

Facsimile : 630-325-7249  
website: [www.viaiv.com](http://www.viaiv.com)

### **Item 1. Cover Page.**

This brochure supplement provides information about Jeffrey R. Coyner that supplements the disclosure brochure. You should have received a copy of that brochure. Please contact Mr. Jeffrey Holland at (630) 674-7226 if you did not receive the brochure for Jeffrey Jacob Holland Investments, LLC or if you have any questions about the contents of this supplement. Additional information about Mr. Coyner is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**Jeffrey Russell Coyner**  
Year of birth : 1960  
CRD # 1989908

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

College : Mr. Coyner graduated from Michigan State University in 1983 with a B.S. in Electrical Engineering. He earned an MBA from Northwestern University Kellogg Graduate School of Management in 1987 and the CFA designation in 1994. He will renew the CFA certification in the near future.

CFA: **To earn a CFA charter**, a candidate must

- have four years of qualified investment work experience,
- become a member of CFA Institute,
- pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis,
- apply for membership to a local CFA member society, and
- complete the CFA Program.

**The CFA Program** is organized into three levels, each culminating in a six-hour exam. Completing the Program takes most candidates between two and five years. The

Program reflects a broad Candidate Body of Knowledge™ (CBOK) developed and continuously updated by active practitioners to ensure that charter holders possess knowledge grounded in the real world of today's global investment industry.

Mr. Coyner has passed the following examinations: Series 3 (11.18.1996); Series 7 (9.16.1989); Series 24 (5.25.2000); and the Series 63 (2.28.1990). On May 1, 2013 he passed the Series 65 examination.

#### Business Background

Jeffrey Jacob Holland Investments, LLC, investment adviser representative from May 1, 2013. He became a 50% member in January 2016.

From 09.1999 to 12.31.2014 he worked for Goldenberg, Hehmeyer & Co. in Hinsdale, IL performing extensive financial research and acting as a proprietary trader; that firm merged with HTG Capital in 2009 (Mr. Coyner is still affiliated with HTG.)

From 1992 until 09.1999 he was a proprietary trader for The Chicago Corporation and for ABN AMRO Incorporated out of Stamford, CT.

He was a US Government Bond Trader from 1989 to 1991 with First Chicago and then with Discount Corp (NY) from 1991-1992. Between 1987 and 1989 he managed a \$2 billion cash portfolio for General Motor's Treasurer's Office in New York, NY.

#### Item 3. Disciplinary Information

There are no events to disclose under this item.

#### Item 4. Other Business Activities

Mr. Coyner works with HTG Capital Partners performing extensive financial research and portfolio management. There is no conflict of interest between that work activity and his investment advice provided through Jeffrey Jacob Holland Investments.

#### Item 5. Additional Compensation.

The only compensation Mr. Coyner receives for his investment advice comes from the fees the firm charges its clients.

#### Item 6. Supervision.

Mr. Holland supervises Mr. Coyner. Mr. Coyner maintains on file in the firm's offices reports of his proprietary trading activities and the formulation of his recommendations for the regulator to review at will.

#### Item 7. State Registration requirements:

Mr. Coyner has no regulatory, disciplinary or legal events to disclose under this item; he has not filed for bankruptcy in the past 10 years.



