
The Holland Group, Retirement Wealth Advisors, LLC

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Form ADV Part 2A – Firm Brochure

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This Brochure provides information about the qualifications and business practices of The Holland Group, Retirement Wealth Advisors, LLC doing business “Retirement Wealth Advisors”. If you have any questions about the contents of this Brochure, please contact us at (727)724-3334. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

The Holland Group, Retirement Wealth Advisors, LLC is registered as an Investment Adviser with the United States Security Administration. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Retirement Wealth Advisors is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the firm’s identification number 326421.

Item 2: Material Changes

Since this is the first filing of the Form ADV Part 2A for Retirement Wealth Advisors, there is nothing to report. In the future, any material changes made during the year will be reported here.

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Item 4: Advisory Business

Description of Advisory Firm

The Holland Group, Retirement Wealth Advisors, LLC doing business “Retirement Wealth Advisors” is SEC registered Investment Adviser with its principal place of business in Florida was founded September 2011, and registered as an investment adviser in June 2023. Steven L. Holland and Elizabeth A. Holland are the principal owners and founders. Because Retirement Wealth Advisors is a new entity, its Assets Under Management are not yet reported.

Types of Advisory Services

Investment Management Services

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors. Fees pertaining to this service are outlined in Item 5 of this brochure. We may employ unaffiliated registered investment advisers as a sub-adviser to provide investment management to our clients.

Financial Planning

Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information and analysis will be considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

The client always has the right to decide whether or not to act upon our recommendations. If the client elects to act on any of the recommendations, the client always has the right to affect the transactions through anyone of their choosing.

In general, the financial plan will address any or all of the following areas of concern. The client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We can provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. Please note that we do not receive compensation for using any attorney recommended by us. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance:** Review of existing policies to ensure proper coverage for life, disability, long-term care, and liability.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary

objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significantly adverse effect on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may affect your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all of our clients. However, specific client financial plans and their implementation are dependent upon a client Investment Policy Statement, which outlines each client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Wrap Fee Programs

We do not sponsor nor participate in a wrap fee program, however our sub-adviser may. If so, please see their Appendix 1 for wrap program information.

Item 5: Fees and Compensation

Please note, unless a client has received the firm’s disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the client within five (5) business days of signing the contract without incurring any advisory fees and without penalty. How we

are paid depends on the type of advisory service we are performing. Please review the fee and compensation information below.

Investment Management Services

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$250,000 - \$2,000,000	1.30%
\$2,000,001 - \$5,000,000	1.15%
\$5,000,001 - \$10,000,000	1.05%
\$10,000,001 and Above	Negotiable

The annual fees are negotiable and are pro-rated and paid in advance on a monthly basis. The advisory fee is a flat fee and is calculated by assessing the percentage rates using the predefined levels of assets as shown in the above chart. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from client accounts. Accounts initiated or terminated during a billing period will be charged a pro-rated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Upon termination of the account, any unearned fee will be refunded to the client on a prorated basis. Financial planning fees are included in the fees paid for investment management services.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-By-Side Management

We do not offer performance-based fees.

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals and high net-worth individuals.

Our minimum account size requirement is \$250,000.

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

Our investment philosophy is based upon **Passive Investment Management**. We primarily practice passive investment management. Passive investing involves building portfolios that are comprised of various distinct asset classes. The asset classes are weighted in a manner to achieve a desired relationship between correlation, risk and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

We also use the following as sources for analysis:

- Morningstar
- Riskalyze Software

We also will utilize **Morningstar** which assigns a 1 to 5 star ranking to each fund, based on past performance relative to peer funds. Star ratings are graded on a curve, the top 10% of funds receives 5 stars, the next 22.5% receive 4 stars, the middle 35% receive 3 stars, the next 22.5% receive 2 stars and the bottom 10% receive 1 star. Each fund received separate ratings for 3-, 5-, and 10-year periods, which it combines into an overall rating. Morningstar doesn't offer an abstract rating for any fund, all information is relative and risk-adjusted.

To further fine tune our understanding of a client's risk tolerance, our Firm does utilize **Riskalyze**, a third-party vendor tool to assist in identifying the Client's risk tolerance. Riskalyze technology assists Financial Advisors with two critical tasks: (1) measuring the risk preferences of investors, and (2) applying these preference measurements to portfolio selection. Riskalyze summarizes an investor's mean-variance risk aversion on a 99 point scale. In connection with this output, the Riskalyze tool "quantifies" the Client's indicated investment risk tolerance through the illustration of expected return (plus/minus) and investment volatility (investment variance) which uses past data to calculate expected variance.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and micro market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest.

Item 9: Disciplinary Information

Retirement Wealth Advisors and its management have not been involved in legal or disciplinary events that are material to a client's or prospective client's evaluation of Retirement Wealth Advisors or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No Retirement Wealth Advisors employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No Retirement Wealth Advisors employee is registered, or have an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

Retirement Wealth Advisors only receive compensation directly from clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Steven Lloyd Holland is Co-Founder of The Holland Group Income Tax and Financial Strategies Inc., an affiliated insurance agency and accounting practice. The Holland Group Income Tax and Financial Strategies Inc. typically recommends Retirement Wealth Advisors to accounting clients in need of advisory services. Conversely, Retirement Wealth Advisors typically recommends The Holland Group Income Tax and Financial Strategies Inc. to advisory clients in need of accounting services. The accounting services provided by The Holland Group Income Tax and Financial Strategies Inc. are separate and distinct from our advisory services and are provided separately and require typical compensation. There are no referral fee arrangements between our firms for these recommendations. No Retirement Wealth Advisors client is obligated to use The Holland Group Income Tax and Financial Strategies Inc. for any accounting services and conversely, no accounting client is obligated to use the advisory services provided by us. The Holland Group Income Tax and Financial Strategies Inc.'s accounting services do not include the authority to sign checks or otherwise disburse funds on any of our advisory clients' behalf. Furthermore, any commissions received through life or health insurance sales do not offset advisory fees the client may pay for advisory services under Retirement Wealth Advisors. This activity accounts for approximately 35% of his time.

Steven Lloyd Holland is licensed as an investment adviser representative of Mutual Trust Asset Management, Inc., a registered investment adviser. As such, Steven Lloyd Holland, in his separate capacity as an investment adviser representative, is able to provide advisory services apart from Retirement Wealth Advisors, for which he will receive separate and customary compensation. While Steven Lloyd Holland endeavors at all times to put the interest of our clients first as part of our firm's fiduciary duty, you should be aware that the receipt of outside compensation itself creates a conflict of interest and may affect their judgment when making recommendations. This activity accounts for approximately 65% of his time.

Recommendations or Selections of Other Investment Advisers

Retirement Wealth Advisors employs other investment advisers (“sub-advisers”) to manage their clients’ accounts. In such circumstances, Retirement Wealth Advisors will compensate the other investment adviser out of its advisory fee. This situation creates a conflict of interest because Retirement Wealth Advisors has a financial incentive to utilize cheaper sub-advisers. However, using a sub-adviser, the client’s best interest and suitability of the other investment adviser will be the main determining factors of Retirement Wealth Advisors. This relationship is disclosed to the client at the commencement of the advisory relationship. Additionally, Retirement Wealth Advisors will only recommend another investment adviser who is properly licensed or registered as an investment adviser.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each client. Our clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to clients.
- Competence - Associated persons shall provide services to clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential client information without the specific consent of the client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons’ conduct in all matter shall reflect credit of the profession.

- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide of copy of its Code of Ethics to any client or prospective client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its “related persons” do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to clients.

Trading Securities at/Around the Same Time as Client’s Securities

Because our firm and its “related persons” do not invest in the same securities, or related securities, e.g., warrants, options or futures, which we recommend to clients, we do not trade in securities at or around the same time as clients.

Investment Advice Relating to Retirement Accounts

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

In addition, and as required by this rule, we provide information regarding the services that we provide to you, and any material conflicts of interest, in this brochure and in your client agreement.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

The Holland Group, Retirement Wealth Advisors, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

1. Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for clients to use, however, clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing clients to choose a specific custodian, we may be unable to achieve most favorable execution of client transaction and this may cost clients' money over using a lower-cost custodian.

Aggregating (Block) Trading for Multiple Client Accounts

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy is to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments, we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Sub-advisers used by Retirement Wealth Advisors may block client trades at their discretion. Their specific practices are further discussed in their ADV Part 2A, Item 12.

Item 13: Review of Accounts

Client accounts with the Investment Management Service will be reviewed regularly on a bi-annual basis by Steven Holland, CEO and CCO. The account is reviewed with regards to the client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or

deletions of client-imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Retirement Wealth Advisors will provide written reports to investment management clients on a bi-annual basis. We urge clients to compare these reports against the account statements they receive from their custodian.

Item 14: Client Referrals and Other Compensation

Pursuant to SEC Regulation Section 275.206.4-1, and applicable state laws, we have entered into “promotion arrangements” with other registered investment advisers. At the time of referral, the prospective client is given full disclosure of the promotion arrangement and the nature of the relationship between us and the other investment adviser.

Item 15: Custody

Retirement Wealth Advisors does not accept custody of client funds, however it is deemed to have limited custody solely with its ability to withdraw fees from clients’ accounts. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Standing Letters of Authorization: Retirement Wealth Advisors does maintain a standing letter of authorization (SLOA) where the funds or securities are being sent to a third party, and the following conditions are met:

- a. The client provides an instruction to the qualified custodian, in writing, that includes the client’s signature, the third party’s name, and either the third party’s address or the third party’s account number at a custodian to which the transfer should be directed.
- b. The client authorizes Retirement Wealth Advisors, in writing, either on the qualified custodian’s form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- c. The client’s qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client’s authorization and provides a transfer of funds notice to the client promptly after each transfer.

- d. The client has the ability to terminate or change the instruction to the client's qualified custodian.
- e. Retirement Wealth Advisors has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- f. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.
- g. Retirement Wealth Advisors maintains records showing that the third party is not a related party of Retirement Wealth Advisors or located at the same address as Retirement Wealth Advisors.

Item 16: Investment Discretion

For those client accounts where we provide investment management services, we maintain discretion over client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the client. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Item 17: Voting Client Securities

We do not vote client proxies. Therefore, clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the client's investment assets. The client shall instruct the client's qualified custodian to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets. If the client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of client funds or securities nor does not require the prepayment of fees of more than \$1,200 six months or more in advance.

Business Continuity Plan Notice

General

The Holland Group, Retirement Wealth Advisors, LLC has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

Disasters

The Business Continuity Plan covers natural disasters such as snowstorms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

Loss of Key Personnel

The Holland Group, Retirement Wealth Advisors, LLC utilizes a “team approach” to working with clients, so generally a client will have a relationship with more than just one The Holland Group, Retirement Wealth Advisors, LLC employee. This has been purposely done in order to provide redundancies in the event that a key employee is not available, and we consider this to be a best practice.

A buy/sell agreement has been established in the event of Steven Lloyd Holland’s serious disability or death for The Holland Group, Retirement Wealth Advisors, LLC to continue serving clients. Clients will be notified at that time.

Privacy Notice

FACTS

WHAT DOES THE HOLLAND GROUP, RETIREMENT WEALTH ADVISORS, LLC DO WITH YOUR PERSONAL INFORMATION?

Why?

Registered Investment Advisers choose how they share your personal information. Federal law gives clients the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect, and share depend on the product or service you have with us. This information can include:

- Information you provide in the subscription documents and other forms (including name, address, social security number, date of birth, income and other financial-related information); and
- Data about your transactions with us (such as the types of investments you have made and your account status).

How?

All financial companies need to share clients' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their clients' personal information; the reasons The Holland Group, Retirement Wealth Advisors, LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information

For our everyday business purposes— to process your transactions, maintain your accounts (for example we may share with our third-party service providers that perform services on our behalf or on your behalf, such as accountants, attorneys, consultants, clearing and custodial firms, and technology companies, respond to court orders and legal investigations, or report to credit bureaus.

For Marketing purposes— to offer our products and services to you

How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.

Our employees are advised about Retirement Wealth Advisors' need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.

We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

Other important information

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent information sharing.

The Holland Group, Retirement Wealth Advisors, LLC

2637 McCormick Drive
Suite 101
Clearwater, Florida 33759

Phone: (727) 724-3334
Fax: (727) 724-4170
Email: Team@thehollandgrp.com

Dated September 1, 2023

Form ADV Part 2B – Brochure Supplement

For

Steven Lloyd Holland

Chief Executive Officer and Chief Compliance Officer

This brochure supplement provides information about Steven Lloyd Holland that supplements The Holland Group, Retirement Wealth Advisors, LLC (“Retirement Wealth Advisors”) brochure. A copy of that brochure precedes this supplement. Please contact Steven Lloyd Holland if the Retirement Wealth Advisors brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Steven Lloyd Holland is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number 2171208.

Item 2: Educational Background and Business Experience

Steven Lloyd Holland

Year of Birth: 1960

Education: High School graduate, some college.

Business Experience

- 09/2011 – Present, The Holland Group, Retirement Wealth Advisors LLC, CEO and CCO
- 03/1997 – Present, The Holland Group Income Tax and Financial Strategies Inc., Co-Founder
- 09/2007 – Present, Mutual Trust Asset Management, Inc., Advisor
- 09/2005 – Present, Mutual Trust Co., of America Securities, Registered Representative
- 06/1993 – Present, The Holland Group, formerly Holland, Dione and Associates, Account Representative and Financial Advisor
- 03/1996 – 09/2005, Veritrust Financial Services, Inc. f/k/a Aragon Financial Services, Inc., Registered Representative
- 12/1994 – 12/1995, SunAmerica Securities, Inc., Registered Representative
- 12/1992 – 10/1994, Royal Alliance Associates, Inc., Registered Representative
- 06/1991 – 01/1993, Gilman, Ciocia, Gilbert CPA and Financial Planning Firm, Account Representative, Financial Advisor, and Registered Tax Preparer
- 06/1989 – 01/1991, Met Life, Insurance Representative

Exams

- 1992: Investment Company Products/Variable Contracts Representative Examination Series 6
- 2000: General Securities Representative Examination (Series 7)
- 2007: Uniform Combined State Law Examination (S66)
- 2012: Uniform Investment Advisor Law Examination (S65)

Insurance Licenses

- 1990: Life, Health & Variable Annuities

Item 3: Disciplinary Information

Steven Lloyd Holland does not have disciplinary history to report.

Item 4: Other Business Activities

Steven Lloyd Holland is Co-Founder of The Holland Group Income Tax and Financial Strategies Inc., an affiliated insurance agency and accounting practice. The Holland Group Income Tax and Financial Strategies Inc. typically

recommends Retirement Wealth Advisors to accounting clients in need of advisory services. Conversely, Retirement Wealth Advisors typically recommends The Holland Group Income Tax and Financial Strategies Inc. to advisory clients in need of accounting services. The accounting services provided by The Holland Group Income Tax and Financial Strategies Inc. are separate and distinct from our advisory services and are provided separately and require typical compensation. There are no referral fee arrangements between our firms for these recommendations. No Retirement Wealth Advisors client is obligated to use The Holland Group Income Tax and Financial Strategies Inc. for any accounting services and conversely, no accounting client is obligated to use the advisory services provided by us. The Holland Group Income Tax and Financial Strategies Inc.'s accounting services do not include the authority to sign checks or otherwise disburse funds on any of our advisory clients' behalf. Furthermore, any commissions received through life or health insurance sales do not offset advisory fees the client may pay for advisory services under Retirement Wealth Advisors. This activity accounts for approximately 35% of his time.

Steven Lloyd Holland is licensed as an investment adviser representative of Mutual Trust Asset Management, Inc., a registered investment adviser. As such, Steven Lloyd Holland, in his separate capacity as an investment adviser representative, is able to provide advisory services apart from Retirement Wealth Advisors, for which he will receive separate and customary compensation. While Steven Lloyd Holland endeavors at all times to put the interest of our clients first as part of our firm's fiduciary duty, you should be aware that the receipt of outside compensation itself creates a conflict of interest and may affect their judgment when making recommendations. This activity accounts for approximately 65% of his time.

Item 5: Additional Compensation

Steven Lloyd Holland does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Retirement Wealth Advisors.

Item 6: Supervision

Steven Holland, as CEO and Chief Compliance Officer of The Holland Group, Retirement Wealth Advisors, LLC is responsible for supervision and supervises personnel and the investments made in client accounts. Steven Holland monitors the investments to ensure they are suitable for the client and consistent with their investment needs, goals, objectives and risk tolerance, as well as any restrictions previously requested by the client. He may be contacted at the phone number on this brochure supplement.