



IAPD Report

STEVEN LLOYD HOLLAND

CRD# 2171208

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Qualifications	2 - 3
Registration and Employment History	4
Disclosure Information	6

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Please contact FINRA with any concerns.



IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



Report Summary

STEVEN LLOYD HOLLAND (CRD# 2171208)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **04/02/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	THE HOLLAND GROUP, RETIREMENT WEALTH ADVISORS, LLC	CRD# 326421	12/26/2023

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **2** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	MUTUAL TRUST ASSET MGMT., INC.	121364	Clearwater, FL	12/19/2012 - 05/14/2024
B	MUTUAL TRUST CO. OF AMERICA SECURITIES	8494	CLEARWATER, FL	09/23/2005 - 02/21/2014
B	VERITRUST FINANCIAL, LLC	106594	AUSTIN, TX	04/22/2002 - 09/23/2005

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	3
Customer Dispute	5



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **2** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **THE HOLLAND GROUP, RETIREMENT WEALTH ADVISORS, LLC**
Main Address: 2637 MC CORMICK DRIVE
SUITE 101
CLEARWATER, FL 33759
Firm ID#: 326421

	Regulator	Registration	Status	Date
IA	Florida	Investment Adviser Representative	Approved	12/26/2023
IA	Texas	Investment Adviser Representative	Restricted Approval	04/02/2025

Branch Office Locations

THE HOLLAND GROUP, RETIREMENT WEALTH ADVISORS, LLC
2637 MC CORMICK DRIVE
SUITE 101
CLEARWATER, FL 33759



Qualifications

PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

This individual has passed 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.


Principal/Supervisory Exams


Exam	Category	Date
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No information reported.

General Industry/Product Exams


Exam	Category	Date
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 General Securities Representative Examination (S7)	Series 7	05/09/2000
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 Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	12/07/1992
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State Securities Law Exams

Exam	Category	Date
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 Uniform Investment Adviser Law Examination (S65)	Series 65	11/01/2012
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  Uniform Combined State Law Examination (S66)	Series 66	08/24/2007
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PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	12/19/2012 - 05/14/2024	MUTUAL TRUST ASSET MGMT., INC.	CRD# 121364	Clearwater, FL
B	09/23/2005 - 02/21/2014	MUTUAL TRUST CO. OF AMERICA SECURITIES	CRD# 8494	CLEARWATER, FL
B	04/22/2002 - 09/23/2005	VERITRUST FINANCIAL, LLC	CRD# 106594	AUSTIN, TX
B	03/15/1996 - 04/22/2002	ARAGON FINANCIAL SERVICES, INC.	CRD# 16023	IRVINE, CA
B	09/25/1995 - 12/07/1995	THE INVESTMENT CENTER, INC.	CRD# 17839	BEDMINSTER, NJ
B	12/08/1994 - 09/05/1995	SUNAMERICA SECURITIES, INC.	CRD# 20068	PHOENIX, AZ
B	10/12/1994 - 12/02/1994	SECURITIES AMERICA, INC.	CRD# 10205	LAVISTA, NE
B	12/09/1992 - 10/04/1994	ROYAL ALLIANCE ASSOCIATES, INC.	CRD# 23131	SCOTTSDALE, AZ

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
09/2011 - Present	The Holland Group Income Tax and Financial Strategies Inc.	CEO and CCO	Y	Clearwater, FL, United States
09/2007 - Present	MUTUAL TRUST ASSET MANAGEMENT, INC.	ADVISOR	Y	CLEARWATER, FL, United States

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

1. The Holland Group Income Tax and Financial Strategies Inc. an affiliated insurance agency and accounting practice. address is same as my office. President. Started in 1994, incorporated in 1997. 20 hours per week, 20 hours during trading hours.
2. Mutual Trust Asset Management, Inc., an unaffiliated registered investment adviser. Investment adviser representative from 09/2007 to present.



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Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	3
Customer Dispute	5

Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

Disclosure 1 of 3

Reporting Source:	Regulator
Regulatory Action Initiated By:	Florida Office of Financial Regulation
Sanction(s) Sought:	Cease and Desist Civil and Administrative Penalty(ies)/Fine(s)
Date Initiated:	05/04/2016
Docket/Case Number:	63452-S
URL for Regulatory Action:	
Employing firm when activity occurred which led to the regulatory action:	Mutual Trust Co. of America Securities
Product Type:	No Product
Allegations:	N/A
Current Status:	Final
Resolution:	Order
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	05/04/2016



Sanctions Ordered: Cease and Desist
Civil and Administrative Penalty(ies)/Fine(s)

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual: 05/04/2016

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement On May 4, 2016, the Office of Financial Regulation entered a Final Order against Steven Lloyd Holland for engaging in prohibited business practices by disclosing confidential client information without approval or consent. Steven Lloyd Holland agreed to pay an administrative fine of \$5,000.

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Reporting Source: Individual

Regulatory Action Initiated By: Florida Office of Financial Regulation

Sanction(s) Sought: Cease and Desist
Civil and Administrative Penalty(ies)/Fine(s)

Date Initiated: 05/04/2016

Docket/Case Number: 63452-S

Employing firm when activity occurred which led to the regulatory action: Mutual Trust Company of America Securities, Inc.

Product Type: No Product

Allegations: IN OR AROUND THE FIRST QUARTER OF 2014, MR. STEVEN LLOYD HOLLAND HAD A CLIENT SUBMIT A NEGATIVE REVIEW ABOUT MR. HOLLAND TO ANGIE'S LIST, A PAID SUBSCRIPTION-SUPPORTED WEBSITE CONTAINING CROWDSOURCED REVIEWS. MR. HOLLAND INFORMED ANGIE'S LIST THAT SUCH COMMENTS BY A CLIENT, WHETHER POSITIVE OR NEGATIVE, VIOLATED THE TERMS OF THE CLIENT'S AGREEMENT WITH MUTUAL TRUST COMPANY OF AMERICA SECURITIES, INC. ("MTCOAS") AND REQUESTED THE COMMENTS BE REMOVED. IN SUPPORT OF THIS REQUEST, MR. HOLLAND PROVIDED A COPY OF THE CLIENT'S NEW ACCOUNT AGREEMENT WITH MTCOAS TO ANGIE'S LIST, BUT FAILED TO REDACT CERTAIN CONFIDENTIAL INFORMATION. MR. HOLLAND STIPULATED TO A FINDING THAT DISCLOSURE OF THE INFORMATION WITHOUT THE CLIENT'S APPROVAL OR CONSENT VIOLATED A FLORIDA REGULATION.

Current Status: Final

Resolution: Stipulation and Consent



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 05/04/2016

Sanctions Ordered: Cease and Desist
Civil and Administrative Penalty(ies)/Fine(s)

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Disclosure 2 of 3

Reporting Source: Regulator

Regulatory Action Initiated By: FLORIDA OFFICE OF FINANCIAL REGULATION ("OFR")

Sanction(s) Sought: Civil and Administrative Penalty(ies)/Fine(s)

Date Initiated: 11/29/2012

Docket/Case Number: 0396-S-8/08

URL for Regulatory Action:

Employing firm when activity occurred which led to the regulatory action: MUTUAL TRUST CO. OF AMERICA SECURITIES

Product Type: No Product

Allegations: THE OFFICE MAINTAINS THAT RESPONDENT VIOLATED SECTION 517. 161(1)(H), FLORIDA STATUTES, AND RULE 69W-600.013(1)(H)1, FLORIDA ADMINISTRATIVE CODE, BY VIOLATING NASD CONDUCT RULE 2210 GOVERNING COMMUNICATIONS WITH THE PUBLIC.

Current Status: Final

Resolution: Order



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 11/29/2012

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$10,000.00

Portion Levied against individual: \$10,000.00

Payment Plan: NONE

Is Payment Plan Current: Yes

Date Paid by individual: 12/03/2012

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement

ON 11/29/2012, THE OFFICE OF FINANCIAL REGULATION ("OFFICE") ENTERED A FINAL ORDER ADOPTING THE STIPULATION AND CONSENT AGREEMENT IN THE MATTER OF MR. HOLLAND ("RESPONDENT"). RESPONDENT NEITHER ADMITTED NOR DENIED THE FINDINGS BUT CONSENTED TO THE ENTRY OF FINDINGS BY THE OFFICE. THE OFFICE FOUND THAT RESPONDENT VIOLATED SECTIONS 517.161(1)(H) AND RULE 69W-600.013 (1)(H)1 BY VIOLATING NASD CONDUCT RULE 2210 GOVERNING COMMUNICATIONS WITH THE PUBLIC. RESPONDENT AGREED TO CEASE AND DESIST FROM ANY AND ALL FUTURE VIOLATIONS OF CHAPTER 517, F.S. AND THE ADMINISTRATIVE RULES THEREUNDER; AND TO PAY AN ADMINISTRATIVE FINE IN THE AMOUNT OF \$10,000.00.

Reporting Source: Individual

Regulatory Action Initiated By: FLORIDA OFFICE OF FINANCIAL REGULATION

Sanction(s) Sought: Civil and Administrative Penalty(ies)/Fine(s)

Date Initiated: 11/29/2012

Docket/Case Number: 0396-S-8/08

Employing firm when activity occurred which led to the regulatory action: MUTUAL TRUST CO. OF AMERICA SECURITIES

Product Type: No Product

Allegations: THE OFFICE MAINTAINS THAT RESPONDENT VIOLATED SECTION 517.161(1)(H), FLORIDA STATUTES, AND RULE 69W-600.013(1)(H)1, FLORIDA ADMINISTRATIVE CODE, BY VIOLATING NASD CONDUCT RULE 2210 GOVERNING COMMUNICATIONS WITH THE PUBLIC.



Current Status: Final

Resolution: Order

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Resolution Date: 11/29/2012

Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$10,000.00

Portion Levied against individual: \$10,000.00

Payment Plan: NONE

Is Payment Plan Current: No

Date Paid by individual: 12/03/2012

Was any portion of penalty waived? No

Amount Waived:**Broker Statement**

THIS STIPULATION AND CONSENT AGREEMENT WAS INITIATED FROM A RETIRED HOLLAND GROUP BROCHURE THAT WAS AUTHORIZED BY MY PRIOR B/D, VERITRUST. AFTER CHANGING B/D'S FROM VERITRUST TO MUTUAL TRUST CO. OF AMERICA SECURITIES (MTC), STATE REGULATORS CONDUCTED A SURPRISE AUDIT OF MY OFFICE. AFTER SPENDING DAYS REVIEWING FILES AND RECORDS, THE STATE WAS UNABLE TO FIND ANYTHING WRONG. AT THE CONCLUSION OF THE EXAM A DUSTY, DOG EARED BOX OF RETIRED BROCHURES WAS FOUND, THAT WAS A LEGACY FROM MY PRIOR ASSOCIATION WITH VERITRUST. BECAUSE THE BROCHURES WERE NO LONGER IN USE, AND I HAD FORGOTTEN OF THEIR EXISTENCE, I HAD NOT BOTHERED TO HAVE THEM APPROVED BY MTC. I WAS EVEN UNAWARE THAT THE EXAMINERS LOOKED AT OR TOOK THEM FROM MY OFFICE. THE BROCHURES WERE NOT EVEN DISCUSSED DURING OUR AUDIT NOR WAS I AFFORDED THE OPPORTUNITY AT THE TIME TO PROVIDE AN EXPLANATION. THIS MATTER WAS ONLY BROUGHT TO MY ATTENTION AT A LATER DATE. OUR COMPLIANCE REVIEWS SINCE 1996 WITH VERITRUST (FORMALLY ARAGON) AND MUTUAL TRUST HAVE BEEN 100% SATISFACTORY. I WAS GIVEN A HOBSON'S CHOICE; EITHER FIGHT CITY HALL AND DEFEND MYSELF AGAINST AN ACCUSATION FOR WHICH I WAS UNJUSTLY ACCUSED AND PAYING THOUSANDS OF DOLLARS IN ATTORNEY FEES IN THE PROCESS OR PAY AN UNJUST ADMINISTRATIVE FINE. I HAD TO MAKE A BUSINESSMAN'S DECISION TO CHOOSE THE LEAST COSTLY OF TWO EVILS AND PAID THE STATE.

Disclosure 3 of 3

Reporting Source: Individual



Regulatory Action Initiated By:	FLORIDA DIVISION OF SECURITIES
Sanction(s) Sought:	Civil and Administrative Penalty(ies)/Fine(s)
Date Initiated:	04/26/1994
Docket/Case Number:	DOAH 94-3906, 06865-93-A (WFM)
Employing firm when activity occurred which led to the regulatory action:	METLIFE
Product Type:	Insurance
Allegations:	BASED ON STATE OF FLORIDIA DEPARTMENT OF INSURANCE CASE NO. 06865-93-A (WFM) REPRESENTATIVE MISREPRESENTED WHOLE LIFE INSURANCE AS A "RETIREMENT SAVINGS" PLAN.
Current Status:	Final
Resolution:	Consent
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Resolution Date:	11/09/1994
Sanctions Ordered:	Civil and Administrative Penalty(ies)/Fine(s) Other: 750.00 FINE BY THE STATE
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$750.00
Portion Levied against individual:	\$750.00
Payment Plan:	PD IN FULL
Is Payment Plan Current:	Yes
Date Paid by individual:	11/09/1994
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	IN 1989 I BEGAN MY FINANCIAL CAREER WORKING FOR METLIFE. I KNEW NOTHING ABOUT SALES LITERATURE AND COMPLIANCE RULES. MY BRANCH MANAGER GAVE ME A SALES LETTER THAT WAS APPARENTLY APPROVED BY METLIFE'S HOME OFFICE. SEVERAL YEARS LATER, THERE WAS A CLASS ACTION SUIT AGAINST METROPOLITAN LIFE AND THE REPRESENTATIVES UTILIZING THIS PARTICULAR LETTER. I WAS NOT FOUND GUILTY OF ANY ACTIONS BUT I WAS FINED BY THE STATE OF FLORIDA. I TRUSTED METLIFE, AND MY BRANCH MANAGER, TO PROVIDE ME WITH LEGAL ADVERTISING MATERIAL. AFTER THIS EVENT, L FELT MORALLY RESPONSIBLE TO RESIGN FROM METLIFE, WHICH L DID. I HAVE



BEEN AN
INDEPENDENT ADVISOR EVER SINCE.



Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 5

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: VERITRUST FINANCIAL, LLC

Allegations: SALE OF UNSUITABLE PRODUCTS IN DECEMBER OF 2002 AND 2003

Product Type: Annuity(ies) - Variable

Alleged Damages: \$400,000.00

Customer Complaint Information

Date Complaint Received: 10/02/2006

Complaint Pending? No

Status: Settled

Status Date: 03/27/2007

Settlement Amount: \$30,000.00

Individual Contribution Amount: \$0.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD 06-03759

Date Notice/Process Served: 10/02/2006

Arbitration Pending? No

Disposition: Withdrawn

Disposition Date: 03/27/2007

Monetary Compensation Amount: \$30,000.00

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: VERITRUST FINANCIAL, LLC

Allegations: SALE OF UNSUITABLE PRODUCTS IN DECEMBER OF 2002 & 2003

Product Type: Annuity-Variable



Alleged Damages: \$400,000.00

Is this an oral complaint?

Is this a written complaint? Yes

**Is this an arbitration/CFTC
reparation or civil litigation?**

Customer Complaint Information

Date Complaint Received: 10/02/2006

Complaint Pending? No

Status: Settled

Status Date: 03/16/2007

Settlement Amount: \$30,000.00

**Individual Contribution
Amount:** \$10,000.00

Arbitration Information

Disposition: Settled

Disposition Date: 03/16/2007

Civil Litigation Information

Disposition: Monetary Judgment to Customer

Disposition Date: 03/16/2007

Broker Statement

CLIENT DECIDED TO TAKE EARLY RETIREMENT AND BEGAN SPENDING DOWN PRINCIPAL, AGAINST MY STRONG ADVICE. AFTER TAKING LOSSES IN A DOWN MARKET, INSTEAD OF WAITING FOR THE MARKET TO RECOVER, WHICH IT DID, THE CLIENT HIRED AN ATTORNEY AND PURSUED A CLAIM OF DAMAGES. I WAS DISMISSED FROM THIS CASE BY THE CLAIMANT ON MARCH 5, 2007 AND WAS NOT FOUND GUILTY.

Disclosure 2 of 5

Reporting Source: Firm

**Employing firm when
activities occurred which led
to the complaint:** VERITRUST FINANCIAL, LLC

Allegations: UNSUITABLE RECOMMENDATIONS

Product Type: Annuity(ies) - Variable

Alleged Damages: \$100,000.00

Customer Complaint Information

Date Complaint Received: 06/21/2005

Complaint Pending? No

Status: Settled

Status Date: 01/12/2006

Settlement Amount: \$50,000.00



Individual Contribution Amount: \$0.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD NUMBER 06-01969

Date Notice/Process Served: 05/30/2006

Arbitration Pending? No

Disposition: Settled

Disposition Date: 12/12/2006

Monetary Compensation Amount: \$50,000.00

Individual Contribution Amount: \$0.00

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: VERITRUST FINANCIAL, LLC

Allegations: UNSUITABLE RECOMMENDATIONS

Product Type: Annuity-Variable

Alleged Damages: \$100,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 06/21/2005

Complaint Pending? No

Status: Settled

Status Date: 01/12/2006

Settlement Amount: \$50,000.00

Individual Contribution Amount: \$0.00

Arbitration Information

Disposition: Settled

Disposition Date: 12/12/2006

Civil Litigation Information

Disposition: Monetary Judgment to Customer

Disposition Date: 05/30/2006

Broker Statement COMPLAINT WAS INITIATED AFTER LOSING MONEY IN THE MARKET.



CLIENT ADMITTED IT WAS HER FAULT THAT SHE LOST MONEY. AFTER THIS COMPLAINT SETTLED, I WAS NOT FOUND GUILTY. AS ONE OF THE MOST SUCCESSFUL ADVISERS IN TAMPA BAY AND POSSIBLY THE STATE OF FLORIDA, WE HAVE HELPED THOUSANDS OF INVESTORS OVER THE YEARS WITH FINANCIAL SERVICES. UNFORTUNATELY, LIKE ANY EXTREMELY SUCCESSFUL COMPANY WE JUST CAN'T PLEASE EVERY SINGLE PERSON THAT WALKS THROUGH OUR FRONT DOOR. OUR TOTAL COMPLAINTS IN REFERENCE TO THE THOUSANDS OF INVESTORS WE HAVE HELPED, REMAINS FAR BELOW ONE HALF OF 1%. WE ARE VERY PROUD OF THE DISCLOSURE, TRANSPARENCY, THOROUGH COMMUNICATION, AND RESPECT THAT WE GIVE TO EVERY SINGLE INVESTOR. HAVING A COMPLAINT RATIO FAR BELOW ONE HALF OF ONE PERCENT OF ALL THE INVESTORS THAT WE HAVE HELPED IN OVER 25 YEARS IS SOMETHING WE ARE VERY PROUD OF. WE WILL CONTINUE TO PURSUE INTEGRITY AND EXCELLENCE AND CUSTOMER SATISFACTION. IN A SEA OF SAMENESS IN THE FINANCIAL PLANNING INDUSTRY, THE HOLLAND GROUP IS PROUD OF OUR VERY UNIQUE AND COMPREHENSIVE RETIREMENT SERVICES. THREE COMPLETE SERVICES UNDER ONE ROOF. INCOME TAX PREPARATION AND TAX REDUCTION ADVICE, ESTATE PLANNING, AND THE CORE SERVICE OF OUR BUSINESS - CUSTOMIZED, DETAILED, COMPREHENSIVE INFLATION ADJUSTED RETIREMENT PLANNING. CALL FOR YOUR INITIAL COMPLIMENTARY CONSULTATION TODAY!

Disclosure 3 of 5

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: VERITRUST FINANCIAL, LLC

Allegations: UNSUITABLE RECOMMENDATIONS (ANNUITIES), NEGLIGENCE, BREACH OF FIDUCIARY DUTY

Product Type: Annuity(ies) - Variable

Alleged Damages: \$100,000.00

Customer Complaint Information

Date Complaint Received: 06/21/2005

Complaint Pending? No

Status: Arbitration/Reparation Settled

Status Date: 05/22/2006

Settlement Amount: \$85,000.00

Individual Contribution Amount: \$0.00

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD DISPUTE RESOLUTION ARBITRATION NUMBER 05-02290

Date Notice/Process Served: 06/21/2005

Arbitration Pending? No



Disposition: Settled
Disposition Date: 05/22/2006
Monetary Compensation Amount: \$85,000.00
Individual Contribution Amount: \$0.00
Firm Statement CLIENT'S ATTORNEY IS STATING "UNSUITABLE RECOMMENDATIONS" WITH VARIABLE ANNUITIES. CLIENTS OWNED A TOTAL OF 8 VARIABLE ANNUITIES PRIOR TO MEETING ME. CLIENTS CHOSE TO INVEST IN THE MARKET AND LOST MONEY, NOW THEY ARE LOOKING FOR SOMEONE TO BLAME.

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: VERITRUST FINANCIAL, LLC
Allegations: UNSUITABLE RECOMMENDATIONS (ANNUITIES), NEGLIGENCE, BREACH OF FIDUCIARY DUTY
Product Type: Annuity-Variable
Alleged Damages: \$100,000.00
Is this an oral complaint? No
Is this a written complaint? Yes
Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 06/21/2005
Complaint Pending? No
Status: Settled
Status Date: 09/05/2005
Settlement Amount: \$85,000.00
Individual Contribution Amount: \$0.00

Arbitration Information

Disposition: Settled
Disposition Date: 06/21/2006
Broker Statement CLIENT'S ATTORNEY ALLEGED "UNSUITABLE RECOMMENDATIONS", WITH ANNUITIES, EVEN THOUGH CLIENT OWNED A TOTAL OF EIGHT VARIABLE ANNUITIES PRIOR TO MEETING ME. CLIENT INFORMED ME PRIOR TO INVESTING ABOUT BEING VERY COMFORTABLE WITH ANNUITIES, AND VALUED THEIR BENEFITS. I WAS NOT FOUND GUILTY OF ANY OF THE ALLEGATIONS. OUR FIRM ALWAYS TRIES TO DELIVER EXCELLENCE TO OUR CLIENTS. AS HARD AS WE TRY TO PLEASE, LIKE ANY SUCCESSFUL COMPANY, THERE ARE ALWAYS A FEW THAT CAN NEVER BE PLEASED - NO MATTER HOW HARD YOU TRY.



Disclosure 4 of 5

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: VERITRUST FINANCIAL, LLC

Allegations: ALLEGATIONS OF NEGLIGENCE (BY [CUSTOMERS]' ATTORNEY), BREACH OF FIDUCIARY DUTY AND FRAUD. ATTORNEY FOR [CUSTOMERS] TRIES TO DOCUMENT THAT HIS CLIENTS WERE UNFAMILIAR WITH ANNUITIES AND STOCKS. CLIENTS INVESTED PRIOR TO OUR FIRST MEETING OVER 90% IN STOCK AND OWNED TWO ANNUITIES. THEY WERE SEEKING AGRESSIVE GROWTH, NOT INCOME OR PRESERVATION OF PRINCIPAL.

Product Type: Annuity(ies) - Variable

Alleged Damages: \$360,000.00

Customer Complaint Information

Date Complaint Received: 11/28/2004

Complaint Pending? No

Status: Arbitration/Reparation

Status Date: 11/28/2004

Settlement Amount:

Individual Contribution Amount:

Arbitration Information

Arbitration/Reparation Claim filed with and Docket/Case No.: NASD 04-07678

Date Notice/Process Served: 11/28/2004

Arbitration Pending? No

Disposition: Settled

Disposition Date: 09/09/2005

Monetary Compensation Amount: \$225,000.00

Individual Contribution Amount: \$25,000.00

Firm Statement THE [CUSTOMERS] ARE STATING IN THEIR COMPLAINT THAT THEY WERE CONSERVATIVE INVESTORS WITH LITTLE OR NO KNOWLEDGE ABOUT ANNUITIES OR THE STOCK MARKET. THE FACT IS, BEFORE I EVER MET THEM THEY OWNED TWO ANNUITIES AND BETWEEN THEM HAD MORE THAN 95% OF THEIR ASSETS IN EQUITIES. THEIR CLAIMS ARE WITHOUT MERIT AND THIS COMPLAINT SHOULD BE DISMISSED.

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: VERITRUST FINANCIAL, LLC



Allegations: ALLEGATIONS OF NEGLIGENCE (BY [CUSTOMERS]' ATTORNEY), BREACH OF FIDUCIARY DUTY AND FRAUD. ATTORNEY FOR [CUSTOMERS] TRIES TO DOCUMENT THAT HIS CLIENTS WERE UNFAMILIAR WITH ANNUITIES AND STOCKS. CLIENTS INVESTED PRIOR TO OUR FIRST MEETING OVER 90% IN STOCK AND OWNED TWO ANNUITIES. THEY WERE SEEKING AGGRESSIVE GROWTH, NOT INCOME OR PRESERVATION OF PRINCIPAL.

Product Type: Annuity-Variable

Alleged Damages: \$360,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 11/28/2004

Complaint Pending? No

Status: Settled

Status Date: 11/28/2004

Settlement Amount: \$225,000.00

Individual Contribution Amount: \$25,000.00

Arbitration Information

Disposition: Settled

Disposition Date: 09/09/2005

Broker Statement

CLIENTS ALLEGED THAT THEY WERE CONSERVATIVE INVESTORS WITH LITTLE OR NO KNOWLEDGE ABOUT THE STOCK MARKET. BEFORE DOING BUSINESS WITH THEM I TOOK THE PRECAUTION OF MAKING PHOTO COPIES OF THEIR CURRENT BROKERS INVESTMENT MIX THAT ILLUSTRATED OVER 90 % OF THEIR LIFE SAVINGS IN STOCKS. THEIR CLAIMS OF BEING CONSERVATIVE INVESTORS WITH LITTLE OR NO KNOWLEDGE ABOUT THE STOCK MARKET WERE WITHOUT MERIT. AS ONE OF THE MOST SUCCESSFUL INDEPENDENT FINANCIAL ADVISORS IN TAMPA BAY AND POSSIBLY THE STATE OF FLORIDA, WE HAVE HELPED THOUSANDS ACHIEVE FINANCIAL SUCCESS. WE ENCOURAGE OUR CLIENTS TO LET US KNOW HOW WE ARE DOING, BOTH GOOD AND BAD. OUR OBJECTIVE IS TO PROVIDE EXCELLENT SERVICE AND SUPERIOR INVESTMENT, INCOME TAX REDUCTION AND ESTATE PLANNING ADVICE. THE HOLLAND GROUP IS PROUD OF OUR VERY UNIQUE AND COMPREHENSIVE RETIREMENT SERVICES. THREE COMPLETE SERVICES UNDER ONE ROOF. INCOME TAX PREPARATION AND TAX REDUCTION ADVICE, ESTATE PLANNING, AND THE CORE SERVICE OF OUR BUSINESS -CUSTOMIZED, DETAILED, COMPREHENSIVE INFLATION ADJUSTED RETIREMENT PLANNING. CALL FOR YOUR INITIAL COMPLEMENTARY CONSULTATION TODAY!

Disclosure 5 of 5

Reporting Source: Individual



Employing firm when activities occurred which led to the complaint: ARAGON FINANCIAL SERVICES, INC.

Allegations: ALLEGATIONS OF NEGLIGENCE AND MISREPRESENTATION OF ANNUITIES. CLIENTS CLAIM THAT THEY WERE UNFAMILIAR WITH ANNUITIES & ANNUITIES WERE NOT EXPLAINED, HOWEVER CLIENTS HAD AN ANNUITY PRIOR TO INVESTING AND RECEIVED PROSPECTUS'S AND ALL ANNUITY INFORMATION PRIOR TO INVESTING

Product Type: Annuity-Variable

Alleged Damages: \$200,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC reparation or civil litigation? No

Customer Complaint Information

Date Complaint Received: 11/13/2001

Complaint Pending? No

Status: Settled

Status Date: 01/24/2005

Settlement Amount: \$45,000.00

Individual Contribution Amount: \$0.00

Arbitration Information

Disposition: Settled

Disposition Date: 01/24/2005

Civil Litigation Information

Type of Court: WILL NOT ALLOW TO CLEAR FIELD

Name of Court:

Location of Court:

Docket/Case #:

Date Notice/Process Served:

Litigation Pending?

Broker Statement

CLIENTS ALLEGED THAT MY RECOMMENDATIONS WERE NOT SUITABLE FOR THEIR NEEDS. WHEN THE MARKET STARTED TO DROP, THEY IGNORED MY EXPLICIT WARNINGS TO REPOSITION THEIR PORTFOLIO TO A SAFER ALLOCATION TO PROTECT THEIR CAPITAL. I WAS NOT FOUND GUILTY OF ANY OF THEIR ALLEGATIONS. AS ONE OF THE MOST SUCCESSFUL INDEPENDENT FINANCIAL ADVISORS IN TAMPA BAY AND POSSIBLY THE STATE OF FLORIDA, WE HAVE HELPED THOUSANDS ACHIEVE FINANCIAL SUCCESS. THE HOLLAND GROUP IS PROUD OF OUR VERY UNIQUE AND COMPREHENSIVE RETIREMENT SERVICES. THREE COMPLETE SERVICES UNDER ONE ROOF. INCOME TAX PREPARATION AND TAX REDUCTION ADVICE, ESTATE PLANNING, AND THE CORE SERVICE OF OUR BUSINESS - CUSTOMIZED, DETAILED,



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End of Report

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