

Howland and Associates, LLC

**Firm Disclosure
(Part 2A of Form ADV)**

March 29, 2023

260 1st Avenue South, Suite 200
St. Petersburg, Florida 33701
(813) 333-2900

www.InvestHowland.com

This Form ADV Part 2A brochure provides information about the qualifications and business practices of Howland and Associates, LLC. If you have any questions about the contents of this brochure, please contact Robert Howland of Howland and Associates, LLC at (813) 333-2900 or Rob@InvestHowland.com.

The information in this *Firm Brochure* has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Howland and Associates, LLC is a registered investment adviser. Registration as an investment adviser with the SEC or the State of Florida does not imply any level of skill or training. Oral and written communications from an investment adviser may be used to evaluate, hire, or retain an investment adviser.

Additional information about Howland and Associates, LLC is available on the SEC's website at www.adviserinfo.sec.gov. The SEC's website also provides information about any persons affiliated with Howland and Associates, LLC who are registered, or are required to be registered, as investment adviser representatives of Howland and Associates, LLC.

This *Firm Brochure* will be updated and amended to reflect changes regarding securities regulations, routine annual updates, and business practices. An annual disclosure or summary of changes to this *Firm Brochure* will be provided to each advisory client.

Item 2 – Material Changes

The previous firm brochure was dated March 30, 2022.

There are (2) material changes to this *Firm Brochure*. (1) Howland and Associates Repository Program (HARP) was added (2) the fee schedule was revised.



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Item 4 – Advisory Business

Howland and Associates, LLC is a registered investment advisor specializing in the management of separate, tailored investment portfolios comprised of publicly traded companies. Howland and Associates, LLC has been providing investment advisory services since its founding in 1992 and is 100% owned by D. S. Howland, CFA.

As of December 31, 2022, Howland and Associates, LLC managed \$80,290,613 in client assets on a discretionary basis. Howland and Associates, LLC neither manages nondiscretionary accounts nor engages in nondiscretionary client relationships.

Investment portfolios are made and managed by Howland and Associates, LLC for families with exceptional circumstances, individual investment situations, employment considerations, or risk reduction concerns.

Howland and Associates, LLC encourages clients to seek the benefits of qualified advice from a CERTIFIED FINANCIAL PLANNER™ professional. Howland and Associates, LLC provides investment management advice for assets under management.

Each client's particular situation determines the need and investment style. To help guide clients in understanding risk and time horizons, Howland and Associates, LLC has designed six investment classifications: (1) *Opportunistic Growth*, (2) *Core*, (3) *Defensive*, (4) *Triton*, (5) *Heritage*, and (6) *Howland and Associates Repository Program*.

Portfolios may deviate from investment style models for periods of time to serve specific purposes, such as personal client concerns, tax efficiency, or volatile market conditions.

Howland and Associates, LLC has an on-going relationship with clients to manage portfolios and investment assets. In most situations, a separate account is set up at a brokerage firm where Howland and Associates, LLC has the limited power to trade investments and process fees.

Client accounts may hold stocks, bonds, exchange traded funds (ETFs), preferred stocks, mutual funds, warrants, fixed income instruments, certificates of deposit, commercial paper, Treasury bills, private placements, cryptocurrencies, options contracts, futures contracts, foreign markets, money market funds, and/or other cash equivalents.

Upon mutual agreement, the manager and client may agree on occasion to retain a non-managed asset in a client's account that is outside the investment strategy. Non-managed assets will be detailed on account statements and may alter portfolio performance. A request to include non-managed assets in a client account must be provided in writing to Howland and Associates, LLC. Supervision is not provided for non-managed assets.

Howland and Associates, LLC does not offer annuities or life insurance products.

Item 5 – Fees and Compensation

Howland and Associates, LLC receives compensation for portfolio management services. A monthly management fee is charged, based on a percentage of the market value of assets under management at the close of trading on the last business day of each month. Monthly fees are rounded up or down to the nearest dollar. Howland and Associates, LLC has the limited power to deduct the monthly management fee in advance from client accounts. The State of Florida considers direct billing of client accounts constructive custody.

On occasion, Howland and Associates, LLC may agree with the client to process and receive fees from a non-managed source of funds.

The initial fee for all accounts is waived for the first partial month. A new client will then be billed for the following month based on the value of the assets on the last day of the first month.

The monthly minimum fee for client relationships is outlined in the Client Agreement. Management fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client.

With discretion, and in limited situations, Howland and Associates, LLC may negotiate specific circumstances and management fees. Family account values may also be bundled to reduce advisory fees.

Accounts may be terminated by the client or Howland and Associates, LLC with written notice. The prepaid monthly fee at Howland and Associates, LLC will be returned for terminated or closed accounts upon written request from the client. Fees returned will be calculated on the date of account closure notice. Howland and Associates, LLC may negotiate limited fees for the time required to process reports and provide information to former clients who wish to obtain records or reports on closed accounts.

Exchange traded funds (ETFs) and mutual funds held in client accounts or account custodians may impose additional service fees, expenses, or transaction costs. Howland and Associates, LLC shall not receive any portion of EFT or mutual fund commissions, fees, or costs.

Clients may incur additional fees and charges imposed by custodians, brokers, or other third parties, which may include custodial fees, transaction fees, sales charge fees, odd-lot differentials fees, transfer taxes fees, wire transfer fees, and electronic fund fees.

A report detailing all account fees charged by Howland and Associates, LLC is available for current clients at any time, without charge, by contacting Robert Howland at (813) 333-2900 or at Rob@InvestHowland.com.

Howland and Associates, LLC charges management fees on a declining tiered fee schedule as a percentage of the client's total assets under management. The maximum annual investment management fee is 1.2%. The annual investment management fee for the Howland and Associates, LLC Repository Program (HARP) is 0.12%. Management fees are billed monthly.

Fee Schedule

Investment Management Fees	Monthly Fee
	\$250 Monthly Minimum Fee
Tiered monthly fee on assets valued less than \$1,000,000	0.10%
Tiered monthly fee on the 1st Million \$1,000,000 - \$1,999,999.99	0.09%
Tiered monthly fee on the 2nd Million \$2,000,000 - \$2,999,999.99	0.08%
Tiered monthly fee on the 3rd Million \$3,000,000 - \$3,999,999.99	0.07%
Tiered monthly fee on the 4th Million \$4,000,000 - \$4,999,999.99	0.06%
Tiered monthly fee on assets valued greater than \$5,000,000+	0.05%

Howland and Associates, LLC Repository Program Accounts (No monthly minimum fee)	Monthly Fee
	0.01%

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

Howland and Associates, LLC does not charge performance-based fees, fees based on capital gains, or fees based on capital appreciation of a client's assets.

Item 7 – Types of Clients

Howland and Associates, LLC seeks to manage client portfolios that are greater than \$1,000,000.00 in value. Portfolio management services are designed for families, high-

net-worth individuals, trusts, estates, Individual Retirement Arrangements (IRAs), corporate pension and profit-sharing plans, and family foundations.

All accounts are retained or accepted at the sole discretion of Howland and Associates, LLC. Howland and Associates, LLC has no conditions or minimum account size for establishing or maintaining an investment advisory account. Small portfolios may require alternate methods of management and allocation.

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

Howland and Associates, LLC manages personalized investment strategies and corresponding portfolios orientated towards requirements, wishes, and needs. Each portfolio reflects a family or individual's unique circumstances, time horizon, risk acceptance, and other holdings.

Howland and Associates, LLC employs a range of fundamental investment strategies to meet portfolio requirements. Stocks purchased for asset appreciation are tracked with analysis of relative price, earnings, and expectations of growth. Positions held for asset protection are analyzed for risks, earnings, reliability, and market conditions.

Howland and Associates, LLC modifies portfolio models to help families and managers frame how money may be invested and evaluate portfolio performance. Portfolio models are positioned around the needs of families, values of individuals, and the stages of life.

Assets in the Howland and Associates, LLC *Opportunistic Growth* strategy model are oriented towards companies with strong growth expectations for long-term investment. The *Opportunistic Growth* strategy was established in 1992 and has been our most prosperous investment strategy for individuals.

The *Defensive* strategy model serves near-term needs and is tilted towards companies with robust earnings.

The *Core Family* strategy portfolio model is composed for families who have complex circumstances. Howland and Associates, LLC will use discretion and understanding to blend the best investment elements for the family's unique situation. The *Core Family* strategy relies on close communication and mutual understanding.

The *Triton* strategy model reflects Howland and Associates, LLC environmental concerns for bountiful and clean oceans, rivers, and waters. For generations, families such as ours have relied on the water cycle for life and liberty. Investment holdings in the *Triton* strategy are less diversified and may have a direct or indirect focus on improved water qualities.

The *Heritage* strategy model at Howland and Associates, LLC is designed for families who have a greater ambition to preserve. Investments in the *Heritage* strategy are

longer term notions. Howland and Associates applies broad investment themes to find companies for families who want or need to invest for the next generation.

The *Howland and Associates Repository Program* (HARP) is designed to invest cash on a provisional, short-term basis upon client request. Howland and Associates, LLC will use cash, cash alternatives, Treasury bonds, corporate bonds, mutual funds, money market funds, commercial paper, and exchange traded funds for potentially greater returns than other cash alternatives. The management fee for the HARP program is lower than the standard investment management fee at Howland and Associates, LLC. Howland and Associates, LLC applies higher fees on other investment management accounts.

Howland and Associates, LLC uses various indexes as a guide for portfolio allocation and performance. Howland and Associates, LLC currently uses the S&P 500® Equal Weight Index (EWI) as a basic index. In the past, Howland and Associates, LLC has used other indexes for portfolio allocation and evaluation. Upon request or in special situations, Howland and Associates, LLC will create a custom index for a family or a portfolio.

Howland and Associates, LLC will work with each client to understand and manage risk of loss, risk aversion, risk capacity (ability to take risk), risk composure (appetite), risk need (need to take risk to reach goals), risk perception (subjective), risk preference (emotion), and risk tolerance associated with their individual investments. Risk profiles and risks vary across time and asset class.

Item 9 – Disciplinary Information



Registered investment advisers are required to disclose all material facts regarding any legal or material disciplinary events that would be relevant to an evaluation of the advisory business or the integrity of its management. Howland and Associates, LLC has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Howland and Associates, LLC is an independent firm.

Howland and Associates, LLC has no affiliations.

Item 11 – Code of Ethics

Howland and Associates, LLC employs a Code of Ethics to ensure a high standard of business conduct, reduce conflicts of interest, and uphold a fiduciary duty. Howland and Associates, LLC frequently reviews, amends, and acknowledges the Code of Ethics to maintain that the policies are reasonably designed to always protect the client's privacy and interests, as well as demonstrate the commitment to the fiduciary duties of honesty and integrity.

The provisions of the Code of Ethics include confidentiality requirements, restrictions on significant gifts or business entertainment items, and employee securities trading controls.

Employee trading is monitored for compliance with applicable restrictions and securities law. Employee trading activities will not interfere with making decisions in the best interests of clients. Employees shall not front-run client accounts or improperly benefit from trades in client accounts. In limited circumstances, an employee at Howland and Associates, LLC may marginally benefit from trading activity in client managed accounts when an employee had previously purchased or sold a stock position that has been added or removed from client portfolios.

Employees at Howland and Associates, LLC, along with clients, participate in equity block trades. Employees and clients both receive an identical per-share price on equity block orders.

Howland and Associates, LLC does not participate in principal, client, or agency cross securities transactions. Howland and Associates, LLC is neither affiliated with nor registered as a broker-dealer.

The Code of Ethics is available upon request by contacting Robert Howland by phone at (813) 333-2900 or at Rob@InvestHowland.com.

Item 12 – Brokerage Practices



Howland and Associates, LLC uses third-party brokerage firms for the custody, security, and clearing of assets. Howland and Associates, LLC holds a limited power of attorney on individual client accounts at brokerage firms to make trades in the client's account and may allocate shares of a block trade to a client account.

Howland and Associates, LLC has limited business relationships with brokerage firms and custodians of assets. Howland and Associates, LLC does not receive compensation from brokerage firms or custodians. The client or manager may choose any custodian or brokerage firm with an agreement between all parties.

Client accounts are balanced and reconciled with the third-party custodian daily.

Howland and Associates, LLC does not participate in soft dollar transactions. Soft dollar transactions are amounts that money managers pay out of their clients' accounts to a brokerage firm to cover the cost of research or other services the firm provides.

Item 13 – Review of Accounts

Howland and Associates reviews and manages Client accounts on an on-going basis to meet investment needs and objectives.

Howland and Associates, LLC meets regularly with clients to discuss portfolio performance, allocation, and investment objectives. Investment managers use an individualized understanding of each client to determine individual investment mandates and nuanced portfolio models.

Howland and Associates, LLC provides a monthly statement for each portfolio that helps the client review and understand their individualized investments. Statements from Howland and Associates may show portfolio allocation, benchmark performance, performance over specific time periods, and performance of individual holdings. Customized client reports are also available upon request.

Item 14 – Client Referrals and Other Compensation

Howland and Associates, LLC provides referral credits to existing clients who help to establish new relationships with friends and family members. Referring clients receive a credit in the amount equal to 100% of the first month management fee of the new relationship.

Item 15 – Custody

Howland and Associates, LLC uses third-party brokerage house services to retain all client assets and does not hold or have physical custody of any client assets, except when processing fees.

Howland and Associates, LLC has authorization to collect fees from client accounts. The ability to collect fees from client accounts is considered constructive custody.

Official account statements and tax documents are provided by brokerage custodians. Howland and Associates, LLC will work with clients and brokerage custodians to explain, manage, and reconcile any account discrepancies.

Charles Schwab & Co., Inc. security values are used for the purposes of performance measurement and fee calculations at Howland and Associates, LLC.

Item 16 – Investment Discretion

Howland and Associates, LLC manages client portfolios with complete discretionary authority. Portfolios are managed in accordance with the portfolio objective as defined in the *Client Agreement*.

Clients may change investment objectives at any time. In limited circumstances, Howland and Associates, LLC and the client may agree to specific limitations and security selection. For example, a client may specify in writing that tobacco company investments should not be purchased in a specific portfolio.

Clients shall notify Howland and Associates, LLC of any changes to tax status or other material factors that potentially impact investment time horizon or risk considerations.

Item 17 – Voting Client Securities

The proxy voting record, policies, and procedures of Howland and Associates, LLC are available upon request. Clients may retain proxy voting authority.

Item 18 – Financial Information

Howland and Associates, LLC has not been subject to any bankruptcy proceedings, nor does it have any financial commitments that impair its ability to meet the contractual and fiduciary commitments made to its clients. Registered investment advisers are required in this item to provide certain financial information or disclosures about the financial condition of Howland and Associates, LLC.

Howland and Associates, LLC was a recipient of the CARES act small business loan in April of 2020 during the global outbreak of COVID-19. At the time of application, the CARES act loan was an opportunity for Howland and Associates, LLC to safeguard against economic uncertainty and adverse business conditions.

Item 19 – Additional Items for State-Registered Entities

- A. Principal executive officers and management persons, their formal education and business background: D. S. Howland, CFA, earned the Chartered Financial Analyst®, designation in 1985. She has been engaged in investment management since graduating from the University of South Florida in 1977. Her degree is a B.A. in Business with a Finance major. She is Past President of Chartered Financial Analysts of Tampa Bay; a member of the Chartered Financial Analyst Institute (CFAI) since 1977. She was formerly Senior Vice President at Eickhoff, Pieper & Willoughby, Inc. (now Sabal Trust), Tampa, Florida, was formerly employed by Suntrust Bank's Trust Division, Tampa, Florida, and was a Securities Analyst at Roulston & Co., Cleveland, Ohio.
- B. Robert C. Howland, CFP, became a CERTIFIED FINANCIAL PLANNER®, in 2019. Robert has completed a Certificate in Financial Planning program of study from the University of Miami. Robert has worked in the finance industry since 2007. He holds a B.A. degree in History and B.A. degree in Media from Southern Methodist University.
- C. Ross Thomas, MS, holds a Master of Science in Science Information Technology from the University of Liverpool and a B.S. in Computer Science from Florida State University.
- D. Chloe Hill, MBA, holds a Master of Business Administration from the University of South Florida and a B.E. from the University of Canterbury.
- E. There is no business in which Howland and Associates, LLC is actively engaged other than investment advice.
- F. Howland and Associates, LLC does not offer performance-based fees.
- G. Howland and Associates, LLC and its management individuals have not been involved in any of the events.
- H. Howland and its management individuals are not involved in any other relationship or arrangement with any issuer of securities that is not listed in Item 10.C. of Part 2A.

Form ADV Part 2B

Item 1- Cover Page

D. S. Howland, CFA

President/Chief Compliance Officer/ Investment Adviser Representative

Howland and Associates, LLC

260 1st Avenue South, Suite 200
St. Petersburg, Florida 33701

(813) 333-2900

www.InvestHowland.com

March 28, 2023

Form ADV Part 2B Brochure Supplement

This *Brochure Supplement* provides information about D. S. Howland, CFA for the Howland and Associates, LLC client brochure. Clients should have received a copy of the brochure. Please contact Robert Howland at Rob@investHowland.com if you did not receive the Howland and Associates, LLC client brochure or if you have any questions about the contents of this supplement. Additional information about D. S. Howland, CFA is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 - Educational Background and Business Experience

Doris Sheppard Howland, CFA® #8324

Year of Birth: 1950

Education:

University of South Florida, BA – Finance, 1977
Chartered Financial Analyst, #8324, 1985

Business background:

Security Analyst and Trader, Roulston & Co., Inc.
Cleveland, OH, 1976

Trust Investment Department, Truist Banks (formerly Flagship Bank of
Tampa) Tampa, FL, 1977 – 1979

Vice President-Portfolio Manager, Sabal Trust Company (formerly Eickhoff,

Pieper & Willoughby, Inc.), Tampa, FL 1983 – 1992)

Principal-Portfolio Manager, Howland and Associates, LLC
Saint Petersburg, FL 1992 – present

Robert C. Howland, CFP® #161094

Year of Birth: 1980

Education:

Southern Methodist University, BA – History, 2004
Southern Methodist University, BA – Film & Media, 2004
University of Miami, Certificate in Financial Planning, 2018

Business Background:

Journalist, Texas Cable News (Belo Corp),
Dallas, Texas, 2004

Personal Assistant – General Electric/ Universal Studios,
Hollywood, CA, 2004 – 2007

Howland and Associates, LLC
Saint Petersburg, FL, 2007 – present

Ross M. Thomas

Year of Birth: 1981

Education:

Florida State University, BA – Management of Information Systems,
2004

University of Liverpool, MS – Science Information
Technology, 2011

Business Background:

Senior Technical Specialist, Janus Digital Displays
St. Petersburg, Florida, 2006 – 2008

Digital Network Administrator, AccentHealth LLC
Tampa, Florida, 2010 – 2017

IT/DevOps Administrator, Rapid Web Services/The SSL Store
St. Petersburg, Florida, 2018 – 2020

Howland and Associates, LLC

Saint Petersburg, FL, 2020 – present

Chloe M. Hill

Year of Birth: 1989

Education:

University of Canterbury, BE – Bachelor of Engineering, 2012

University of South Florida, MBA – Business Administration, 2013

Business Background:

Branch Banker, Truist Bank (formerly BB&T Bank)

St. Petersburg, Florida, 2016 – 2018

Financial Advisor, CentraVest Financial, Raymond James

St. Petersburg, Florida, 2019 – 2020

Howland and Associates, LLC

Saint Petersburg, FL, 2020 – present

Item 3 - Disciplinary Information



Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to an evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4 - Other Business Activities

Registered investment advisers are required to disclose all facts regarding material conflicts that may impact a relationship between the advisory business and the supervised person's other financial industry activities. No information is applicable to this Item.

Item 5 - Additional Compensation

Registered investment advisers are required to disclose all facts regarding someone who is not a client and provides an economic benefit to the supervised person for providing advisory services. No information is applicable to this Item.

Item 6 - Supervision

D. S. Howland, CFA is the owner of the firm, as well as Chief Investment Officer and Portfolio Manager. She makes all decisions regarding portfolio management in a

manner consistent with applicable laws, SEC guidelines, and regulations. D.S. Howland, CFA is the primary client contact for the firm.

Item 7 – Requirements for State-Registered Advisors

- A. Howland and its management person have not been involved in any of the events.
- B. No supervised person associated with Howland and Associates, LLC has been the subject of a bankruptcy petition.



Addendum

Professional Designations – Minimum Qualifications Required for Each Designation

CFA® - Chartered Financial Analyst®

Issued by: CFA Institute

Prerequisites/Experience Required: Candidate must meet the following requirements: Undergraduate degree and 4 years of professional experience involving investment decision-making

Educational Requirements: Self-study program (250 hours of study for each of the 3 levels)

Examination Type: 3 course exams, offered annually or semi-annually

Continuing Education/Experience Requirements: None required but highly recommended

CFP® – CERTIFIED FINANCIAL PLANNER™

Issued by: Certified Financial Planner Board of Standards, Inc.

Prerequisites/Experience Required: Candidate must meet the following requirements: A bachelor's degree (or higher) from an accredited college or university, and 3 years of full-time personal financial planning experience

Educational Requirements: Candidate must complete a CFP-board registered program, or hold one of the following:

- CPA
- ChFC
- Chartered Life Underwriter (CLU)
- CFA
- Ph.D. in business or economics
- Doctor of Business Administration
- Attorney's License

Examination Type: CFP Certification Examination

Continuing Education/Experience Requirements: 30 hours every 2 years