

## THE DRISCOLL GROUP, INC.

A REGISTERED INVESTMENT ADVISOR

8825 Perimeter Park Blvd., Suite 604

Jacksonville, Florida 32216

904-620-9993

www.TheDriscollGroup.com

Dated January 1, 2024

This brochure provides information about the qualifications and business practices of The Driscoll Group, Inc. (TDGI). If you have any questions about the contents of this brochure, please contact us at 904-620-9993. Please Note: 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.

TDGI is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you information you can use to determine whether or not to hire or retain an Adviser.

Please also note: additional information about TDGI is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>. The SEC's web site also provides information about TDGI's Registered Investment Adviser Representatives (IARs).

## ITEM 2 – MATERIAL CHANGES

This section describes the material changes to The Driscoll Group, Inc's. (TDGI) Form ADV ("Firm Brochure") since its last annual update amendment on January 1, 2023. This Firm Brochure, dated January 1, 2024, has been prepared according to the U.S. Securities and Exchange Commission's ("SEC") disclosure requirements.

Material Changes since the Last Update

Since the last ADV Annual Amendment filing, there are no material changes to report.

#### Full Brochure Available

In lieu of providing clients with an updated Firm Brochure each year, we may provide TDGI's existing advisory clients with a summary describing any material changes occurring since the last annual update of our Firm Brochure. In such instances, we will make this delivery to existing clients within 120 days of the close of TDGI's fiscal year.

Clients wishing to receive a complete copy of the then-current Firm Brochure may request a copy at no charge by contacting TDGI's compliance department at 904-620-9993.

The brochure is also available on our web site, <u>www.thedriscollgroup.com</u> free of charge.

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## ITEM 4 – ADVISORY BUSINESS

The Driscoll Group, Inc. (TDGI) is a Registered Investment Advisor headquartered in Jacksonville, Florida. TDGI, structured as an S Corporation, has been in business since 1996. Kevin Driscoll is the Founder, President and CEO as well as the sole shareholder of the company. TDGI's primary business focus is to provide financial plans for its clients utilizing a holistic approach toward helping clients achieve their financial goals.

In preparing financial plans, TDGI uses the 6 step process recommended by the Financial Planning Association. In essence, we:

- 1. Identify what the client desires and what we can provide, defining the relationship in terms of expectations and responsibilities
- 2. Take a picture of the client's overall situation and identify the client's goals
- 3. Analyze the situation and identify the pertinent issues
- 4. Develop, prepare and deliver a recommended plan of action
- 5. Help the client implement the plan
- 6. Provide a means clients can use to monitor their progress

Financial plans are based on the client's financial situation at the time the plan is presented and are based on financial information disclosed by the client to TDGI.

Financial plans will supply analysis and recommendations regarding the actions and investment strategies appropriate for the client's stated goals and objectives. Depending on the client's situation, the financial analysis and plan will address issues in one or more of the following areas:

- Retirement planning
- Investment planning
- Tax planning
- Estate planning
- Business planning
- Education planning
- Disability protection
- Long term health care issues

TDGI's financial planning services terminate upon delivery of the plan/advice. The advice given may include the recommendation of annual reviews/updates. It is the client's responsibility to initiate additional services as may be needed. We do not take assets into custody nor do we take or have discretionary trading authority over any client's portfolio.

The TDGI may provide ancillary services (i.e., consultation or analysis work apart from or in addition to financial planning) upon request. These services might include:

- Business plan reviews
- Real estate rental analysis
- Consultation regarding an asset sale or potential investment, etc.

TDGI may also provide investment/asset allocation advice on a non-discretionary basis regarding a client's allocation of their retirement plan assets (e.g., 401(k), 403(b), SIMPLE, 457, etc.). Here the Advisor works in conjunction with the client (given the constraints of the plan(s) available to the client) to determine the investment allocation and investment vehicles best suited to meet the client's objectives.

In any regard, TDGI cannot and does not offer any guarantee or promise that the client's financial goals and/or objectives will be met. Clients are encouraged to frequently update the firm as to changes in their financial situation, goals, objectives or needs. Clients are also advised that within the financial planning process, assumptions are made with respect to inflation, expected interest and discount rates, expected life spans, etc. and that invariably these assumptions will be erroneous, at least to some degree.

The client is under no obligation to act on any TDGI's recommendations. Moreover, if the client elects to act on any of the recommendations, the client is under no obligation to implement the financial plan through TDGI. Clients may act on TDGI's investment recommendations by placing securities transactions with any brokerage firm the client chooses.

Clients choosing to implement the plan with one of TDGI Planners does so with the understanding they are entering into a separate business arrangement apart from that with TDGI. While TDGI is not involved in the sale of investment products, TDGI Planners are licensed to sell securities and insurance products. The sale/management of securities generates fees and/or commissions which typically comprise 90%  $\pm$  of Planner income.

## ITEM 5 – FEES AND COMPENSATION

#### Financial Planning Fees

Fees for financial planning are negotiable, but will generally range from \$750 to \$10,000. The fee is based on the time required to prepare the Plan and present and review the Plan with Client. The Planner(s) hourly rate will range from \$200-\$400 depending on the expertise and experience of the planner(s) performing the work. Additional financial planning services will be billed at a rate of \$100-\$400, again depending on the level of planner(s) expertise and

services provided. The quoted fee is payable upon delivery of the services. Planning fees are guaranteed, meaning that, upon presentation of the plan, if the client does not feel the plan provides more values than its cost, the planning fee will be waived. In such a situation, the work product shall remain with the Planner.

#### Ancillary Service Fees

TDGI may provide consultation and work, apart from or ancillary to, financial planning services, at a rate of \$400 per hour (½ hour minimum).

The Planner will estimate the hours required to produce the work product and will not exceed that estimate without the Client's approval.

#### Fees For Allocation, Fund Selection And Monitoring of Retirement Plans

The advisory fee, based on the account value is charged quarterly, in advance, at an annualized rate of 1.00% for the first \$100,000, 0.70% of the next \$400,000, 0.60% of the next \$500,000 and 0.50% for accounts over \$1,000,000. There is a minimum investment of \$100,000 for this account.

#### **Termination**

Financial Planning Services:

The agreement terminates upon presentation of the plan. If on delivery of the plan the client does not, for whatever reason feel that the plan is worth what is being charged, the planning fee is waived, provided the plan document is left with the planner.

#### Ancillary Services:

The agreement terminates upon delivery of the agreed upon work product. The Agreement may be cancelled (in writing) at any time, by either party, for any reason. Upon termination, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. This agreement terminates upon presentation of the analysis and/or recommendations.

Allocation and Fund Selection Services:

For retirement plan assets (401(k), 403(b), SIMPLE, 457, etc.) clients will have a period of five (5) business days, from the date the agreement is signed, to unconditionally rescind the agreement and receive a full refund of all fees paid. Thereafter, the client may terminate the agreement by providing us written notice at our principal place of business. Upon termination

any prepaid, unearned fees will be promptly refunded. Both the Client and TDGI have the right to terminate the contract at any time.

## ITEM 6 – PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

TDGI does not charge performance-based fees. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees.

## ITEM 7 – TYPES OF CLIENTS

Our firm generally provides advisory services to individuals, business owners, pension and profit sharing plans, trusts, estates and charitable organizations. TDGI does not require a minimum asset amount for financial planning or hourly consulting.

## ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

TDGI may use charting, technical and cyclical analysis in the process of making portfolio recommendations for a client.

Charting analysis involves analyzing past and current trends and patterns.

Technical analysis involves the analysis of past market data; primarily price and volume.

**Cyclical analysis** involves the analysis of business cycles to identify both opportunities and concerns within various sectors of the economy.

TDGI does not analyze individual securities, but rather evaluates the Client's portfolio structure to determine if it is appropriate given the client's financial objectives. Once done, TDGI may recommend a portfolio structure, which in its opinion, better suits the client's goals, objectives, risk tolerance, etc. The recommended portfolio structure will also include recommendations regarding specific types of assets stated in generic terms.

TDGI may utilize analysis provided by third-party firms to evaluate economic opportunities and areas of concern.

TDGI also consults with retirement plan specialists at Raymond James & Associates, member FINRA/SIPC and its affiliate, Raymond James Insurance Group on matters regarding retirement plan design and administration.

TDGI consults with specialists in such areas as mutual funds, exchange traded funds and variable annuities and with the due diligence staff at Raymond James Financial Services, Inc. (Member FINRA/SIPC) and Raymond James & Associates, Inc., (Member New York Stock Exchange/SIPC).

The investment strategies used to implement any investment advice given by TDGI to its clients may include long term purchases (securities held at least one year) and short term purchases (securities sold within a year).

## INVESTING IN SECURITIES INVOLVES A RISK OF LOSS THAT YOU SHOULD BE PREPARED TO BEAR.

## ITEM 9 – DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of TDGI or the integrity of TDGI's management. TDGI has no history of any disciplinary action.

# ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Associated persons/Planners of TDGI are licensed as registered representatives to sell securities through Raymond James Financial Services, Inc. ("RJFS") and may be registered as Investment Adviser Representatives (IARs) with Raymond James Financial Services Advisors, Inc., an SEC-registered investment adviser. In this capacity, Investment Adviser Representatives (IARs) may be involved in the sale of securities of various types, including, but not limited to, stocks, bonds, exchange traded funds, mutual funds, etc. and receive commissions and/or fees for those transactions. In addition, IARs may be involved in the sale of various insurance products. At times the interest of the planner's personal account may correspond with the Client's and then he/she may do what he/she suggests the Client do. In each instance this is disclosed to the Client. It is further noted that TDGI is in and shall continue to be in compliance with the Insider Trading and Securities Enforcement Act of 1988. Specifically, TDGI has adopted a firm-wide policy statement outlining inside trading compliance which all TDGI employees have reviewed and acknowledged their understanding. This policy includes provisions for:

1. Restricting access to files

- 2. Providing continuing education
- 3. Prohibiting trading of securities on which TDGI may have non-public information
- 4. Requiring all TDGI employees & families to conduct their trading through local RJFS accounts
- 5. Monitoring the securities trading of TDGI employees.

## ITEM 11 – CODE OF ETHICS

TDGI has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at TDGI must acknowledge the terms of the Code of Ethics annually, or as amended.

TDGI's clients or prospective clients may request a copy of the firm's Code of Ethics by visiting our website or by contacting the firm directly at 904-620-9993.

### ITEM 12 – BROKERAGE PRACTICES

Investment Adviser Representatives (IARs) of TDGI are registered representatives of Raymond James Financial Services, Inc. (RJFS), a registered broker-dealer with the FINRA, and may recommend RJFS to advisory clients for brokerage services. Registered representatives of RJFS are subject to FINRA Conduct Rule 3280 that restricts them from conducting securities transactions away from RJFS. Therefore, clients are advised that such IARs are limited to conducting securities transactions through RJFS. It may be the case that RJFS charges a higher or lower fee than another broker charges for a particular type of service, such as transaction fees. Clients may utilize the broker dealer of their choice and have no obligation to purchase or sell securities through RJFS. However, if the client does not use RJFS, the IAR will reserve the right not to accept the account. As a registered FINRA broker dealer, RJFS routes order flow through its affiliated broker dealer.

Raymond James & Associates, Inc. (RJA) is obligated to seek best execution pursuant to FINRA Rule 5310 for all trades executed, however better executions may be available via another broker dealer based on a number of factors including volume, order flow and market making activity.

## ITEM 13 – REVIEW OF ACCOUNTS

TDGI does not manage accounts. Reviews are not part of the financial planning service agreement with clients. As such, reports are not furnished to clients on a regularly scheduled basis. They are, however, furnished upon request, and as part of a review.

Although the Planner is not obligated to conduct reviews, reviews are generally provided whenever requested. The suggested frequency of reviews is included in the recommendation section of the financial plan. The individual Planner (or Planners) who produced the original plan will generally serve as the reviewer.

# ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

From time to time TDGI's Planners may receive compensation in the form of sponsorship fees for seminars, meetings or conferences from product sponsors such as mutual funds and insurance companies. Such sponsorship fees generally entitle the sponsor to an allotted presentation to representatives of TDGI. The Driscoll Group, Inc. does not pay or accept referral fees or any form of remuneration from other professionals or individuals.

If clients act upon the advice of an Investment Adviser Representative (IAR) advice, and choose to use one of the applicant's affiliates as a money manager, custodian or insurance provider, the IAR may receive compensation in the form of commissions from the affiliate. If a client chooses to use the IAR in his individual capacity as an insurance agent, the IAR will generally receive a commission. Additionally, if a client purchases a mutual fund containing a 12b-1 fee, the adviser/representative may receive such fee.

As part of its fiduciary duties to clients, TDGI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TDGI [or its related persons] in and of itself creates a potential conflict of interest.

## ITEM 15 – CUSTODY

TDGI does not have custody of any accounts. Do note however, that clients should receive at least quarterly statements from any and all broker dealers, banks or other qualified custodians that hold and maintain the client's investment assets. TDGI urges you to carefully review such statements.

## ITEM 16 – INVESTMENT DISCRETION

TDGI does not have discretionary authority over client's accounts.

## ITEM 17 – VOTING CLIENT SECURITIES

TDGI will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

## ITEM 18 – FINANCIAL INFORMATION

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about TDGI's financial condition. TDGI has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. Neither TDGI nor its management have been the subject of a bankruptcy petition.

TDGI does not require nor solicit prepayment of more than \$500 in fees, per client, six months or more in advance.

# ITEM 19 – REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Principal Executive Officers and Management Persons; Their Formal Education an Business Background

The Driscoll Group, Inc. Planners must have at least a Bachelors Degree or industry equivalent in terms of financial planning experience. In addition, Planners must have at least five years prior experience in the financial services industry, or have successfully completed the education requirements to be a Certified Financial Planner (CFP<sup>®</sup>) or Chartered Financial Analyst (CFA<sup>®</sup>) or a Chartered Financial Consultant (ChFC<sup>®</sup>). TDGI currently has one supervisory/management person and one executive officer; Kevin Driscoll.

#### Management Background

See response to Form ADV Part 2B - Investment Advisor Brochure Supplement.

#### Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

TDGI is not involved in the sale of investment products, but Planners are licensed to sell securities. The sale of securities and insurance generates commissions and/or fees, which comprise approximately 90% of planner income and approximately 80% of their time.

#### How Performance Based Fees are Calculated (and Degree of Risk to Clients)

TDGI does not charge performance based fees.

#### Material Disciplinary Disclosures for Management Persons of this Firm

No management person at TDGI has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

#### Material Relationships That Management Persons Have With Issuers of Securities (If Any)

The TDGI has no relationship or arrangement with issuers of securities. However, TDGI management persons and Planners have a relationship with Raymond James, who is an issuer of securities.



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Dated January 1, 2024

FORM ADV PART 2B – INVESTMENT ADVISOR BROCHURE SUPPLEMENT

SUPERVISOR: KEVIN DRISCOLL

This brochure supplement provides information about the firm's Supervised Persons that supplements The Driscoll Group, Inc. (TDGI) Brochure. You should have received a copy of that brochure above. Please contact us 904-620-9993 if you did not receive The Driscoll Group, Inc. (TDGI) Brochure or if you have any questions about the contents of this supplemental brochure.

Please also note: additional information about TDGI is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>. The SEC's web site also provides information about TDGI's Registered Investment Adviser Representatives (IARs). You may search this site using a unique identifying number, known as the CRD number for the Supervised Person.

8825 Perimeter Park Blvd., Ste. 604 Jacksonville, FL 32216

### EDUCATION AND BUSINESS BACKGROUND

The Driscoll Group, Inc. Planners must have at least a Bachelor's Degree or industry equivalent in terms of financial planning experience. In addition, Planners must have at least five years prior experience in the financial services industry, or have successfully completed the education requirements to be a Certified Financial Planner (CFP<sup>®</sup>) or Chartered Financial Analyst (CFA<sup>®</sup>) or a Chartered Financial Consultant (ChFC<sup>®</sup>). TDGI currently has one supervisory/management person; Kevin Driscoll, President.

#### Kevin Driscoll, CRD #1282953

Year of Birth - 1957

Educational Background:

BA Communications and Psychology (double major), Glassboro State College, 1978

MS Applied Psychology, Stevens Institute of Tech., 1981

Certified Financial Planner (CFP®), College for Financial Planning, 1987

Admitted to the Registry of Financial Planning Practitioners, April 1992

Chartered Financial Consultant (ChFC®), American College, 2001

Chartered Life Underwriter (CLU®), American College, 2002

**Business Background:** 

Director of Management Development, Baptist Medical Center, Nov. 1982 - Dec. 1983

Financial Planner, Key Financial Planning Corporation, Dec. 1983 - May 1987

Registered Representative with Integrated Resources Equity Corporation, July 1984 – May, 1987

Partner/Financial Planner, Benoit, Parker, Driscoll & LeMaistre, P.A., May 1987 - March, 1996

Registered Representative with Raymond James Financial Services, Inc., May 1987 - Present

Registered Principle with Raymond James Financial Services, Inc., March 1996 - Present

President/Financial Planner, The Driscoll Group, Inc. - March 1996 - Present

#### Investment Adviser Representative of RJFSA, August 13, 2009 - present

#### **Disciplinary Information**

None

#### Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations above.

If Clients act upon advice provided by Mr. Driscoll as an IAR, Mr. Driscoll or TDGI may receive fees and/or commissions. On security related transactions, Raymond James Financial Services and/or their affiliates may receive fees and/or commissions. On assets custodied at Raymond James & Associates, Raymond James Financial Services and/or their affiliates may receive fees and/or commissions.

TDGI is not involved in the sale of investment products, but Planners like Mr. Driscoll are licensed to sell securities. As such, the sale of securities and insurance generates commissions and/or fees, which comprise approximately 90% of planner income and approximately 80% of their time.

TDGI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TDGI [or its related persons such as Mr. Driscoll] in and of itself creates a potential conflict of interest.

Mr. Driscoll, independently of TDGI, is also an Investment Adviser Representative of RJFSA.

#### Additional Compensation

Mr. Driscoll does not pay for or receive compensation for Client referrals.

#### **Supervision**

As owner of TDGI Mr. Kevin Driscoll (he can be reached at 904-620-9993) is ultimately responsible for any advice he renders and as such is not subject to additional supervision.

#### Requirements for State Registered Advisers

Neither TDGI nor any management persons have been involved in any activities resulting in a disciplinary disclosure.

No Supervised Person has been the subject of a bankruptcy petition.

#### Cory Jordan Driscoll, CRD #6054086

Year of Birth - 1986

Educational Background:

BA Philosophy, Florida State University, April, 2011

Certified Financial Planner (CFP®), College for Financial Planning, May, 2016

**Business Background:** 

Investment Adviser Representative, The Driscoll Group, November, 2017 – Present

Investment Adviser Representative, Raymond James Financial Services Advisors (RJFSA), June 2013 - present.

Registered Representative with Raymond James Financial Services, Inc., October, 2012 – Present

Employee, The Driscoll Group, April, 2012 - Present

Assistant, Raymond James Financial Services, Inc., April 2012 – July, 2012

Disciplinary Information

None

**Other Business Activities** 

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations above.

If Clients act upon advice provided by Mr. Driscoll as an IAR, Mr. Driscoll or TDGI may receive fees and/or commissions. On security related transactions, Raymond James Financial Services and/or their affiliates may receive fees and/or commissions. On assets custodied at Raymond James & Associates, Raymond James Financial Services and/or their affiliates may receive fees and/or commissions. Mr. Driscoll is also an Investment Adviser Representative of RJFSA.

TDGI is not involved in the sale of investment products, but Planners like Mr. Driscoll are licensed to sell securities. As such, the sale of securities and insurance generates commissions and/or fees, which comprise approximately 90% of planner income and approximately 80% of their time.

TDGI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TDGI [or its related persons such as Mr. Driscoll] in and of itself creates a potential conflict of interest.

#### Additional Compensation

Mr. Cory Driscoll does not pay for or receive compensation for Client referrals.

#### **Supervision**

Mr. Cory Driscoll is supervised by Mr. Kevin Driscoll, majority owner of TDGI. Mr. Kevin Driscoll can be reached at 904-620-9993.

#### Requirements for State Registered Advisers

Neither TDGI nor any management persons have been involved in any activities resulting in a disciplinary disclosure.

No Supervised Person has been the subject of a bankruptcy petition.

#### Jeffrey Bryce Driscoll, CRD #6429077

Year of Birth - 1988

Educational Background:

BS Psychology, Florida State University, August, 2011

BS Biology, Florida State University, August, 2011

Retirement Income Certified Professional (RICP<sup>®</sup>), American College of Financial Services, July, 2017

Certified Financial Planner (CFP®), College for Financial Planning, April, 2018

Accredited Institutional Fiduciary (AIF®), Fi360, May, 2019

**Business Background:** 

Investment Adviser Representative, The Driscoll Group, November, 2017 – Present

Registered Principle with Raymond James Financial Services Advisors (RJFSA), Inc., 2016 - Present

Registered Representative with Raymond James Financial Services Advisors, Inc., January, 2015 – Present

Investment Adviser Representative with Raymond James Financial Services (RJFSA), January, 2015 - present

Employee, The Driscoll Group, January, 2015 - Present

Assistant, Raymond James Financial Services, Inc., May, 2005 - August, 2008

**Disciplinary Information** 

None

Other Business Activities

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations above.

If Clients act upon advice provided by Mr. Driscoll as an IAR, Mr. Driscoll or TDGI may receive fees and/or commissions. On security related transactions, Raymond James Financial Services and/or their affiliates may receive fees and/or commissions. On assets custodied at Raymond James & Associates, Raymond James Financial Services and/or their affiliates may receive fees and/or commissions. Mr. Driscoll is also an Investment Adviser Representative of RJFSA.

TDGI is not involved in the sale of investment products, but Planners like Mr. Driscoll are licensed to sell securities. As such, the sale of securities and insurance generates commissions and/or fees, which comprise approximately 90% of planner income and approximately 80% of their time.

TDGI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TDGI [or its related persons such as Mr. Driscoll] in and of itself creates a potential conflict of interest.

#### Additional Compensation

Mr. Jeffrey Driscoll does not pay for or receive compensation for Client referrals.

#### Supervision

Mr. Jeffrey Driscoll is supervised by Mr. Kevin Driscoll, majority owner of TDGI. Mr. Kevin Driscoll can be reached at 904-620-9993.

#### Requirements for State Registered Advisers

Neither TDGI nor any management persons have been involved in any activities resulting in a disciplinary disclosure.

No Supervised Person has been the subject of a bankruptcy petition.

#### Jennifer Alice Harris, CRD #4449521

Year of Birth - 1972

Educational Background:

BA Psychology, UNF 1994

Certified Financial Planner (CFP®), October 2007

**Business Background:** 

Investment Adviser Representative with Raymond James Financial Services (RJFSA), September 2020- present.

Registered Representative with Raymond James Financial Services, Inc., September 2020 - Present

Investment Adviser Representative with BBVA Wealth Solutions, Inc., June 2017 – September 2020

Registered Representative with BBVA Securities, Inc., June 2017 - September 2020

Investment Adviser Representative with Investment Professionals, Inc., May 2016 - June 2017

Registered Representative with Investment Professionals, Inc., May 2016 - June 2017

Investment Adviser Representative with CUSO Financial Services, L.P., October 2008 – May 2016

Registered Representative with CUSO Financial Services, L.P., September 2008 – May 2016

Investment Adviser Representative with Northwestern Mutual Investment Services, LLC, January 2008 – September 2008

Registered Representative with Northwestern Mutual Investment Services, LLC, January 2007 – September 2008

Registered Representative with Northwestern Mutual Investment Services, LLC, February 2003 – November 2005

Disciplinary Information

None

#### **Other Business Activities**

Disclosure on Outside Business Activities is provided in Form ADV Part 2A Item 10 – Other Financial Industry Activities and Affiliations above.

If Clients act upon advice provided by Ms. Harris as an IAR, Mr. Driscoll or TDGI may receive fees and/or commissions. On security related transactions, Raymond James Financial Services and/or their affiliates may receive fees and/or commissions. On assets custodied at Raymond James & Associates, Raymond James Financial Services and/or their affiliates may receive fees and/or commissions. Ms. Harris is also an Investment Adviser Representative of RJFSA.

TDGI is not involved in the sale of investment products, but Planners like Ms. Harris are licensed to sell securities. As such, the sale of securities and insurance generates commissions and/or fees, which comprise approximately 90% of planner income and approximately 80% of their time.

TDGI endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by TDGI [or its related persons such as Ms. Harris] in and of itself creates a potential conflict of interest.

#### Additional Compensation

Ms. Harris does not pay for or receive compensation for Client referrals.

#### Supervision

Ms. Harris is supervised by Mr. Kevin Driscoll, majority owner of TDGI. Mr. Kevin Driscoll can be reached at 904-620-9993.

#### Requirements for State Registered Advisers

Neither TDGI nor any management persons have been involved in any activities resulting in a disciplinary disclosure.

No Supervised Person has been the subject of a bankruptcy petition.