



## American Century Advisory Services, Inc.

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This document (referred to as the “Brochure”) provides information about the qualifications and business practices of American Century Advisory Services, Inc., as required by Part 2A of Form ADV.

American Century Advisory Services, Inc. is referred to in this Brochure as “**we**,” “**us**” or “**our**.” If you have any questions about the contents of this Brochure, please contact us at 1-800-345-2021.

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.

American Century Advisory Services, Inc., is registered with the SEC as an investment adviser. Registration of an investment adviser does not imply any level of skill or training. You, our client or prospective client, should consider the information provided in this Brochure while making your decision to retain our services.

Additional information about us is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 – Material Changes

In 2010, the SEC amended the rules and requirements for the disclosure document that we are required to provide to our clients. This Brochure is a new document prepared in accordance with the SEC's new rules and requirements. As such, this Brochure is materially different in structure and requires certain new information that our previous brochure did not require.

Starting in March 2012, this Item will provide a summary of specific material changes that were made to the Brochure since the last annual update.

We will provide our clients with a new Brochure as necessary based on changes or new information, and upon request, free of charge.

Additional information about us is also available on the SEC's web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's web site also provides information about any persons affiliated with us who are registered, or are required to be registered, as our investment adviser representatives.



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## Item 4 – Advisory Business

We were organized in 1999 and provide financial planning services to individuals. These services include investment education, portfolio evaluations, asset allocations and mutual fund recommendations. Upon request, we also provide recommendations regarding portfolios of the Kansas Postsecondary Education Savings Trust (a “Kansas 529 Plan portfolio”). Such services are offered through our investment adviser representatives who are registered with the SEC (referred to in this Brochure as “Advisory Representatives”). Registration with the SEC does not imply a certain level of skill or training.

## Ownership

We are a wholly-owned subsidiary of American Century Companies, Inc. (“ACC”). ACC has a multi class capital structure under which certain classes have different voting rights. Accordingly, as of November 4, 2011, ACC's owners were as follows:

<u>Shareholder</u>	<u>Equity Interest</u>	<u>Voting Interest</u>
Stowers Institute for Medical Research*	42.6%	47.9%
Canadian Imperial Bank of Commerce	40.5%	10.1%
Current Employees and Others	16.9%	42.0%

\*Includes shares held by Stowers Resource Management Inc.

Stowers Resource Management Inc. (“SRM”) is a “supporting organization” (as that term is defined in the Internal Revenue Code), and as such, a public charity. Its primary function as a legal entity is to support the Stowers Institute for Medical Research (“SIMR”). Jim and Virginia Stowers founded SIMR in 1994 as a not-for-profit institute dedicated to benefiting humankind through basic research on genes and proteins that control fundamental processes in living cells to unlock the mysteries of disease (including cancer) and find the keys to their causes, treatment, and prevention. It is one of the largest endowments in the world among private basic biomedical research institutions. Through its ownership interest, SRM is entitled to over forty percent of ACCs’ profits.

All active employees of ACC and its subsidiaries also participate in the ownership of the firm.

Since August 2011, Canadian Imperial Bank of Commerce (“CIBC”) has held a minority interest in ACC and holds two of ten seats on ACC’s board of directors. From investment management and general business perspectives, however, ACC and CIBC are legally and operationally independent and distinct.



## **Our Advisory Services**

We provide investment education, portfolio evaluations, asset allocations and mutual fund and 529 Plan portfolio recommendations (referred to as “**Financial Planning Services**”) to individuals. Our Financial Planning Services are intended primarily for current investors in the mutual funds managed by American Century Investment Management, Inc., one of our sister corporations that is also registered with the SEC as an investment adviser. In this Brochure, these funds are referred to as the “American Century Investments mutual funds.”

We offer our Financial Planning Services over the phone and in person. Our recommendations to you will mainly include recommendations regarding asset-allocation and investments in American Century Investments mutual funds. You may or may not accept and act upon our recommendations.

## **Item 5 – Fees and Compensation**

We are not compensated for providing the Financial Planning Services to our clients.

Neither we nor any of our supervised persons accept compensation, including asset-based sales charges or service fees from the sale of mutual funds, for the sale of securities or other investment products to our advisory clients.

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

We do not charge any fee, including a performance-based fee, for providing Financial Planning Services to our clients.

## **Item 7 – Types of Clients**

We provide investment education, portfolio evaluations, asset allocations and mutual fund and 529 Plan portfolio recommendations to individual investors. Our Financial Planning Services are intended for investors in the American Century Investments mutual funds.

You must provide us with a valid e-mail address if e-mail communication is desired and/or a valid street address, which we may rely on to communicate with you. If you fail to keep us apprised of changes to your address, you waive any claims resulting from the failure to receive such communications.

We do not require you to have a minimum amount of assets in order to obtain our Financial Planning Services. American Century Investments mutual funds, however, do require a minimum investment of \$2,500.



By accepting our Financial Planning Services, you acknowledge that you understand and agree that, for our mutual protection, we may monitor any or all of your communication with us, including recording all telephone conversations. Please see our Privacy Policy (provided in Item 11 below) for further information about the privacy of the information you provide to us.

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

During the evaluation stage of services, one of our Advisory Representatives will request that you complete a “risk tolerance questionnaire” designed to solicit certain pertinent information from you, including information regarding your overall financial situation, investment objectives, risk tolerances, investment time horizon and investment restrictions. Based on your responses to this questionnaire and other information our Advisory Representative obtains during discussions with you, we will evaluate your existing portfolio of investments and investment goals, determine your risk tolerance, and suggest a pre-determined asset allocation portfolio that corresponds with that risk tolerance. Each “risk-based” portfolio will be comprised of a mix of American Century Investments mutual funds that reflects one of the following risk tolerance categories: very conservative, conservative, moderate, aggressive or very aggressive.

In addition to the information you provide to us, we may also consider other specific data when developing recommendations, such as risk-adjusted performance of the American Century Investments mutual funds versus their peer group, Morningstar category and the universe of available funds; security-specific information such as mutual fund expense ratios, turnover rates, and percent of the fund in its top 10 holdings; and current market data and information that can be derived from such data (e.g., the yield curve). In certain circumstances, we may also consider your existing securities holdings when suggesting the asset allocation structure for your portfolio. We will only consider these holdings (which may include non-American Century Investments mutual funds, stocks, bonds, and cash) if you request us to do so.

An asset-allocation committee is responsible for selecting and determining the weights of the mix of American Century Investments mutual funds within each risk-based portfolio. The members of this committee include the leader of our Financial Management Solutions group, the Chief Investment Officer of ACIM, the Chief Investment Officer of each of ACIM’s investment disciplines (e.g., U.S. growth-large cap, U.S. growth-mid and small cap, U.S. value, quantitative equity, fixed income, non-U.S. equity and asset-allocation) and a few other ACIM portfolio managers and analysts. This committee created the “moderate” asset allocation portfolio based on the amount of risk implied by the risk associated with the average pension fund. The “very conservative” and “conservative” portfolios are based off of that mix, but with less risk, and the “aggressive” and “very aggressive” portfolios have additional risk. The portfolios are allocated among the various American Century Investments mutual funds



chosen first on the basis of investment style, then secondly on prospective performance relative to that style.

There also is a tactical component to the portfolios. Throughout each quarter, we watch for market anomalies that might provide investment opportunities, and frequently communicate with the portfolio managers of the underlying American Century Investments mutual funds to keep a pulse on the various markets. We then use that information to help formulate views on the relative value of each asset class. We hold formal meetings with the portfolio managers quarterly to discuss the consistency of each of the bottom-up market views with the top-down economic view. We use information obtained during these meetings, along with the results of quantitative models and fundamental economic analysis, to determine whether a change should be made to both the asset classes and/or the specific funds recommended.

If you request an alternative to one or more of the American Century Investments mutual funds that we suggested in our asset allocation recommendation, we will research other available mutual fund options and then recommend alternate funds that, in the Advisory Representative's opinion, provide comparable asset-class exposure as those American Century Investments mutual funds included in our initial recommendation.

You may use our Financial Planning Services as frequently as you choose to track the progress of your portfolios and investment goals. You are responsible for periodically reviewing your accounts to monitor the impact of market movements and changes in the value of the mutual funds held in your portfolio. We strongly encourage you to update your account information periodically by communicating with one of our Advisory Representatives. You should update your account information to reflect any significant change in the composition of your investment portfolios, financial condition, or personal circumstances. Failure to do so may negatively impact the value of our services.

The information and reports that we provide to you as part of our Financial Planning Services are not guarantees of future results. We advise you to use the Financial Planning Services as a tool in your financial and investment planning and not as a substitute for your own informed judgment.

If you are interested in investing in a Kansas 529 Plan portfolio, we can evaluate information that you provide to us and recommend one or more portfolios that are most likely to help you meet your investment objective. The Kansas 529 Plan portfolios are comprised of shares of American Century Investments mutual funds, as well as shares of certain other mutual funds.

## **Investment Risks**

Investing in securities, including shares of mutual funds (directly or indirectly through a Kansas 529 Plan portfolio), involves risk of loss that you should be prepared to bear. At any



given time your shares may be worth less than the price you paid for them. In other words, it is possible to lose money by investing in a fund or portfolio.

In addition, your ability to achieve your investment objective depends in part on our skill in determining the appropriate asset class allocation for you and recommending the appropriate mutual funds and fund weightings to you. There is a risk that our evaluations and assumptions regarding asset classes and underlying funds may differ from actual market conditions.

Investing in mutual funds involves other risks as well, including:

*Style Risks* – The mix of American Century Investments mutual funds that we recommend to you or those in your Kansas 529 Plan portfolio will represent a mix of investment styles, each of which has risks associated with it. For example, growth stocks can be volatile and may lack dividends that can cushion share prices during market declines. Value stocks may continue to be undervalued by the market for long periods of time.

*Market Risk* – The value of a fund's shares will go up and down based on the performance of the companies whose securities it owns and other factors generally affecting the securities market.

*Price Volatility* – The value of a fund's shares may fluctuate significantly in the short term.

*Foreign Securities* – A fund may invest in foreign securities, which can be riskier than investing in U.S. securities. Securities of foreign issuers may be less liquid, more volatile and harder to value than U.S. securities.

*Currency Risk* – If a fund invests in securities denominated in foreign currencies, the fund is subject to currency risk, meaning that the fund could experience gains or losses based solely on changes in the exchange rate between foreign currencies and the U.S. dollar.

*Interest Rate Risk* – A fund that invests in debt securities is sensitive to interest rate changes. Generally, the value of debt securities and the fund that holds them decline as interest rates rise. A fund's investments are generally designed to reduce this risk. Interest rate risk, however, is generally higher for funds with long-weighted maturities than those with shorter-weighted maturities, such as money market funds.

*Credit Risk* – A fund that invests in debt securities, even investment-grade debt securities, is subject to credit risk. Credit risk is the risk that the inability or perceived inability of the issuer to make interest and principal payments will cause the value of the securities to decrease. As a result a fund's share price could also decrease. Changes in the credit rating of a debt security held by a fund could have a similar effect.



*Prepayment Risk* — A fund that invests in debt securities backed by mortgages or other assets is exposed to prepayment risk. If these underlying assets are prepaid, the fund may benefit less from declining interest rates than funds of similar maturity that invest less heavily in mortgage- and asset-backed securities.

*Derivative Risk* — Some funds invest in derivative instruments. Use of derivative instruments involves risks different from, or possibly greater than, the risks associated with investing directly in securities and other traditional instruments. Derivatives are subject to a number of risks, including liquidity, interest rate, market, credit and correlation risk.

*Liquidity Risk* — American Century Investments mutual funds may also be subject to liquidity risk. During periods of market turbulence or unusually low trading activity, in order to meet redemptions it may be necessary for a fund to sell securities at prices that could have an adverse effect on the fund's share price.

*Nondiversification* — Some funds that we manage are diversified while others are nondiversified. A nondiversified fund may invest a greater percentage of its assets in a smaller number of securities than a diversified fund. This gives the portfolio managers the flexibility to hold large positions in a small number of securities. If so, a price change in any one of those securities may have greater impact on the fund's share price than would be the case in a diversified fund.

## **Warranties and Representations**

We do not represent, warrant or imply that the Financial Planning Services or methods of analysis used by our Advisory Representatives or the members of our asset-allocation committee can or will predict future results, successfully identify market tops or bottoms, or insulate you from financial losses. We also do not guarantee that your financial goals or objectives will be achieved. Further, we do not promise or represent that the Financial Planning Services that we provide will, if implemented by you, provide a better return than other investment strategies.

## **Item 9 – Disciplinary Information**

Under this Item, we are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of our advisory business or the integrity of the members of our management. We have no information applicable to this Item to disclose.

## **Item 10 – Other Financial Industry Activities and Affiliations**

We are under common control with the following entities that also provide financial services:



- American Century Investment Management, Inc. (“ACIM”) is an investment adviser registered with the SEC and the investment manager for the American Century Investments mutual funds and the Kansas 529 Plan portfolios.
- American Century Investment Services, Inc. (“ACIS”) is a broker-dealer registered with the SEC and the distributor for the American Century Investments mutual funds and the 529 Plan portfolios.
- American Century Brokerage, Inc. (“ACB”) is an introducing broker-dealer registered with the SEC.

As part of our Financial Planning Services, we will provide advice to clients regarding asset allocations and in most cases, recommend that you invest in a mix of American Century Investments mutual funds. A conflict of interest may exist between our and our staff's interests and the interests of our clients due to our affiliation with ACIM. To mitigate this conflict, we do not charge clients for the Financial Planning Services that we provide, and we do not receive a fee from ACIM for client referrals. In addition, when determining our employees' compensation and evaluating their performance, we do not consider a client's decision to act on our advice or to invest in mutual funds managed by ACIM. None of our recommendations are based on the amount of, or any change in, the management fees that ACIM or any other affiliate can or would receive if our client accepts our investment recommendations.

If you decide to accept and act upon our investment recommendations, you may do so by transacting through your own broker-dealer or investment adviser, or through one of our affiliated broker-dealers, ACB or ACIS (but only for investments in American Century Investments mutual funds and Kansas 529 Plan portfolios). While our Advisory Representatives will provide you with information about the services offered by ACB and ACIS, you are responsible for selecting the broker-dealer or other financial intermediary to process your transactions.

If you open an account with ACB and implement your investment decisions through that account, ACB may charge you an account fee and/or brokerage commissions. If you decide to open an account with ACIS and purchase or sell shares of American Century Investments mutual funds or Kansas 529 Plan portfolios through that account, ACIS will not charge you an account fee or brokerage commission to do so.

If you decide to invest in an American Century Investments mutual fund or a Kansas 529 Plan portfolio, you, as an investor in the fund or portfolio, will pay ACIM the management fee that is charged by the fund or portfolio and is disclosed in the product's offering document. This management fee is based on a percentage of the daily net assets of each class of shares of the fund and is negotiated by the advisor and either the fund's board of directors or the Kansas State Treasurer for the Kansas 529 Plan portfolios, as applicable.



If you purchase a mutual fund through your broker-dealer or other financial intermediary (such as a bank, insurance company, plan sponsor or financial professional), the fund and its related companies may pay the intermediary for the sale of fund shares and related services. These payments may create a conflict of interest by influencing the broker-dealer or other intermediary to recommend the fund to you over another investment.

We have entered into an agreement with ACIM, pursuant to which we, for a fee, agree to market the investment advisory *services* offered by ACIM to institutional investors. This arrangement does not impact the investment recommendations we provide to you. Members of our institutional sales team actively market ACIM's advisory *services* to institutional investors, but do not market these services to our advisory clients and do not market American Century Investments mutual funds or Kansas 529 Plan portfolios. These institutional salespersons are also registered representatives of ACIS. Our institutional salespersons do not determine or provide investment advice or make investment recommendations to our advisory clients. We pay our institutional salespersons a fixed base salary and provide eligibility for an annual variable bonus. The amount of their bonus may be impacted by their success in marketing ACIM's advisory services to institutional investors, but not by our clients' decision to invest in American Century Investments mutual funds.

## Item 11 – Code of Ethics

Our business is built on trust. In its efforts to ensure that all members of our corporate family always seek to do the right thing for you and for each other, we have adopted a Code of Ethics and a Business Code of Conduct, each designed to help ensure that our business is conducted in accordance with the law and with the highest ethical standards.

### Code of Ethics

Our Code of Ethics guides the personal investment activities of our employees, officers and directors, and members of their immediate family. Our employees, as well as employees of our related persons and companies, are required to (a) provide duplicate confirmations of any transaction in covered brokerage accounts and (b) comply with restrictions regarding transacting in American Century Investments mutual funds. In addition, those individuals associated with ACIM and/or those who consistently obtain information regarding current recommendations with respect to American Century Investments mutual funds or real-time trading information regarding the funds, are required to comply with additional restrictions. These additional restrictions include, but are not limited to preclearance of personal securities transactions in non-exempt securities, periodic transaction reporting and the filing of initial/annual holdings reports with our compliance department.

Under the Code of Ethics certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the



best interest of our clients. Because the Code of Ethics in some circumstances would permit employees to invest in the same securities as our clients, there is a possibility that employees might benefit from investment activity in a client's account. Due to this conflict of interest between us and our clients, we continually monitor employee trading, as required by the Code of Ethics, to ensure compliance with the Code.

The Code of Ethics also requires our employees to acknowledge at least annually that they have received, read and will comply with the Code, provide account information for reportable mutual fund and brokerage accounts, disclose any potential conflicts of interest, and provide duplicate confirmations of transactions in reportable brokerage accounts to our compliance department. The Code of Ethics also includes provisions regarding the treatment of confidential information of our clients.

In addition, the Code of Ethics prohibits employees from short term and abusive trading in the American Century Investments mutual funds, and requires our employees to comply with certain trading restrictions in the mutual funds.

Failure to comply with the Code of Ethics constitutes a violation of the policy and results in sanctions, including, without limitation, formal warning with manager notification, required attendance of a Code of Ethics training session, suspension of trading privileges, fine, disgorgement of profits, and/or suspension or termination of employment.

We will provide a copy of the Code to any client or prospective client upon request.

### **Business Code of Conduct**

We have also adopted a Business Code of Conduct that expresses the firm's commitment to the highest degree of ethical business standards and provides general guidelines for employees to use, along with their own good judgment, while conducting business. The Code of Conduct includes provisions relating to the protection of your privacy, a prohibition on insider trading and the sharing of non-public information, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, restrictions on outside employment and outside directorships, restrictions on political contributions, and personal securities trading procedures. A violation of the Business Code of Conduct may result in disciplinary action up to and including termination of the employee's employment.

We and ACIM are each a wholly-owned subsidiary of ACC. On occasion, ACIM and ACC may buy or sell shares of the same American Century Investments mutual funds that we recommend to you.



## **Our Privacy Commitment**

### **It's a matter of privacy — yours**

Trust is the foundation of any solid relationship. With us, trust takes on even greater importance because you are entrusting us with your goals and plans for your financial future. We take that responsibility seriously and work hard to do the right thing by providing solid value, excellent investment recommendations and the best service possible. We apply this same integrity to protecting your privacy.

We do not sell your personal information to anyone.

- Because we limit the use of your personal information, there is no opportunity for you to opt out of sharing it with third-party service providers. Please know these companies are not authorized to use it or share it for any purpose other than to help us serve you.

This summary of our privacy policy describes the type of personal information we collect, how we use it and, perhaps most important, what we do to protect it.

### *What type of information do we collect?*

The information we collect about you generally falls into one of the following categories:

- Information, such as your address, Social Security number, your date of birth, income and investment profile, that you provide on account applications or during your business relationship with us.
- Account information, such as your investment choices, account balances and transaction history.
- Personal information about you, such as estimated household income and investable assets, that consumer reporting agencies and other organizations may provide to us.

If you conduct business with us online, you may notice our use of Internet “cookies” — electronically transmitted files that hold small pieces of information. When you navigate through our Web site, your browser requests pages for you to review. That request includes the information stored in the cookie we previously sent to your computer. Cookies help us better understand how investors use our Web site, so we can improve your online experience. Once you are logged in, cookies maintain your security as you move from page to page within the site. You can learn more by visiting [americancentury.com](http://americancentury.com) and searching the keyword “cookie.”

### *How do we use the information we collect?*

We use the information we collect primarily to maintain your accounts and process your transactions. In doing so, we may share this information with other financial services companies in our corporate family, such as the transfer agent and distributor for the American



Century Investments mutual funds. We also may share this information with outside service providers that we retain to perform administrative or other services on our behalf. Examples include print and mail service providers that assist us in distributing materials, such as statements, prospectuses and reports. We also may share this information with others under certain limited circumstances permitted by law, such as to resolve a dispute or prevent fraud.

### *Do we use this information for marketing?*

Our vision, which drives all our company activities, is to help people achieve their financial goals. We rely on the information we collect to help us better understand you and your investing needs. This allows us to offer relevant investment products and services that may interest you. From time to time, we may share this information with other financial services companies in our corporate family. On occasion, we also may share it with others we retain to help us with our research efforts, mailings or other marketing or communication activities.

### *How do we protect your information?*

We treat all personal information as confidential and use it solely and exclusively to provide financial products and services for your benefit.

We do not sell the personal information we collect. All service providers outside of our corporate family with whom we share personal information are not authorized to use or share it for any purpose other than to help us serve you.

Our policies limit access to your personal information to those who must have it to service your account. We maintain physical, electronic and procedural safeguards to protect this information. We regularly review these safeguards and adjust them as appropriate. We treat information about our former customers with the same care we take with current customers' information. We believe that your privacy should be respected. We appreciate and take seriously your trust in us and our ability to safeguard your personal information.

For more information, please visit [americancentury.com](http://americancentury.com) and search the keywords "privacy commitment." Or, you may contact us at the address provided on the cover page of this Brochure.

## **Participation or Interest in Client Transactions**

The investment recommendations we provide to you relate primarily to your portfolio of American Century Investments mutual funds and the allocation of your assets among those funds or the Kansas 529 Plan portfolios. ACIM, a related person of ACAS, acts as the investment adviser of the American Century Investments mutual funds and the Kansas 529 Plan portfolios and receives management fees from the mutual funds and Kansas 529 Plan portfolios for the advisory services provided. You may, however, include holdings in your portfolio that we review that are not American Century Investments mutual funds. While we in most cases will only recommend investments in American Century Investments mutual funds,



we do not base our investments recommendations on the amount of, or any change in, the management fees that ACIM can or would receive if you accept our recommendations.

On occasion, ACIM and ACC may buy or sell shares of the mutual funds managed by ACIM. ACIM may also, on occasion, recommend securities for its clients' accounts that they also recommend for its and ACC's proprietary accounts, including investment and incubator/test portfolios. Certain trades for its proprietary accounts are purchased and sold separately, while others are aggregated with its client accounts. To the extent trades for its proprietary accounts are aggregated with the accounts of ACIM's clients, the trades are aggregated according to ACIM's policy for the aggregation of portfolio transactions. That policy is designed to (a) minimize the risk that a client could be systematically advantaged or disadvantaged in connection with the aggregation of orders and (b) ensure that all clients are treated fairly in the aggregation and allocation of portfolio transactions.

## **Item 12 – Brokerage Practices**

You are responsible for implementing your investment decisions by contacting the brokerage firm or other financial intermediary of your choice. You may implement your investment decisions by contacting your broker-dealer or financial intermediary, or by contacting a registered representative of ACB, or a registered representative of ACIS (but only for investments in American Century Investments mutual funds or Kansas 529 Plan portfolios).

Neither we nor our Advisory Representatives receive any compensation if you select ACB or ACIS to implement your investment advice. If you implement your investment advice through ACB, ACB may charge you an account fee and/or brokerage commissions. If you purchase shares of American Century Investments mutual funds or Kansas 529 Plan portfolios through ACIS, ACIS will not charge you an account fee or brokerage commission.

## **Item 13 – Review of Accounts**

We will review your account with you as frequently as you would like. At a minimum, we recommend that you contact us on an annual basis for an account review. Many of our clients request us to perform semi-annual reviews of their accounts.

We strongly encourage you to update information provided to us on a regular basis to reflect any change in your investments, overall financial situation, and personal circumstances that may impact your financial needs, goals or objectives.

You may request reports from us as frequently as you choose. We can provide you with a comparison of your current portfolio and the recommended portfolio, projections of growth based on major asset classes (e.g., stocks, bonds, and cash) for both the current and recommended portfolios, and other information about the investment options.



#### **Item 14 – Client Referrals and Other Compensation**

Neither we nor any of our related persons has any arrangement, oral or in writing, where we or a related person is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with providing investment recommendations to you.

Neither we nor any of our related persons compensate any person who is not a supervised person for client referrals.

#### **Item 15 – Custody**

We do not have, nor will we accept, custody of your funds or securities.

#### **Item 16 – Investment Discretion**

We do not have, nor will we accept, discretionary authority over your account(s).

#### **Item 17 – Voting Client Securities**

We do not have, nor will we accept, the authority to exercise the voting rights associated with the securities purchased and/or held by you.

#### **Item 18 – Financial Information**

Because we have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to you and have not been the subject of a bankruptcy proceeding, we have no required financial disclosures.