

# TRANSAMERICA RETIREMENT ADVISORS, INC.

## Personal Retirement Services

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This brochure provides information about the qualifications and business practices of Transamerica Retirement Advisors, Inc. (formerly known as Diversified Investment Advisors, Inc.) If you have any questions about the contents of this brochure, please contact us at (866)-368-0566. 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.

Transamerica Retirement Advisors, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Transamerica Retirement Advisors, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

March 1, 2014

## SUMMARY OF MATERIAL CHANGES

*Each March Transamerica Retirement Advisors, Inc. is required to prepare an annual update of its Form ADV. In conjunction with this annual update, TRA prepares a summary of the specific material changes that have been made to its Form ADV brochure. The following is a summary of the material changes since the last update of our brochure on January 1, 2014.*

*Personal Retirement Services, a division of Transamerica Retirement Advisors, Inc., has no material changes to report since filing its last Disclosure Brochure.*

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## Advisory Business

### *Our Firm*

Transamerica Retirement Advisors, Inc. (“TRA”) is a registered investment advisory firm that, with its predecessors, has been in business since 1992. TRA is part of the AEGON family of companies, a global leader in pensions. TRA is a wholly-owned subsidiary of Transamerica Retirement Solutions Corporation (“TRSC”), a firm dedicated to providing services to retirement plans and their participants. TRSC is an indirect wholly-owned subsidiary of AEGON USA, LLC, a financial services holding company whose primary emphasis is on life and health insurance, and annuity and investment products. AEGON USA is owned by AEGON US Holding Corporation, which is owned by Transamerica Corporation. Transamerica Corporation is owned by The AEGON Trust, which is owned by AEGON International B.V., which is owned by AEGON NV, a Netherlands corporation, and a publicly traded international insurance group (“AEGON”).

As of December 31, 2013, TRA has the following assets under management, which are not related to the services described herein:

Discretionary – Defined Benefit retirement plans: \$3,465,547,621

Non-discretionary – Defined Benefit retirement plans: \$129,866,937.

These figures are computed in the same fashion as in our Form ADV, Part 1A.

Although, the services offered through PRS are a new offering through TRA, our investment advisor representatives have offered similar services through an affiliated registered investment adviser, Transamerica Financial Advisors, Inc (“TFA”). For example, as of December 31, 2013, the approximate non-discretionary assets under management related to Third-Party Money Management services offered by our investment advisor representatives through TFA were \$159,841,627.

### *Our Advisory Services*

#### **Third-Party Money Management Programs (“TPMM”)**

TRA helps customers get ready for, and transition through, retirement. At the time we offer our advisory services to clients, our investment advisor representatives (“Advisors”) conduct interviews with clients to determine their financial needs and objectives. The Advisor will analyze a client’s current financial situation, investment goals, and present strategies. The Advisor will then provide recommendations to a client based on the Advisor’s analysis.

Our Advisors have access to a lineup of third-party money managers that focus on providing managed portfolios to clients with minimum account balances of generally \$150,000. The third-party money manager will typically utilize either exchange traded products or mutual funds within their investment strategies. In some cases, the third party money manager may include equity securities, municipal securities, US government securities, exchange traded notes and/or other securities products within their investment strategies (please refer to the specific third-party money manager's Form ADV Part 2A or other disclosure document for a complete listing of the types of investments it may use in a client's portfolio).

Within each TPMM, the manager selected will have discretionary authority over your account in order to conduct the necessary trading activity. Specific advice as to the types of investments to be used is not given by the Advisor, but is determined by the selected TPMM.

In addition to recommending the TPMM, our Advisors may also provide assistance to the client by explaining any special instructions for the management of the assets in an account; in understanding the investment management process, investment objectives, and the investment strategies undertaken as part of the service; in reviewing and completing the written materials required by the TPMM; in monitoring reports, statements and performance results; in monitoring the client's ongoing needs and financial situation and in answering questions about the service.

### **Financial Planning Services**

Financial Planning Services are provided to clients on a one-time or periodic basis, meaning it is provided to a client based on the client's needs at a particular point in time. As a result, there is no ongoing monitoring of a client's situation or needs. The services are non-discretionary, meaning the client must affirmatively act to implement TRA's recommendations.

As a part of the Financial Planning Service, TRA offers financial plans to certain clients and will work with such clients to determine when a financial plan is appropriate. TRA and the client will mutually decide which topics to address. The financial plan may include some or all of the following topics: retirement goal planning, asset allocation review and insurance analysis, which are discussed in further detail below. The plan will provide a summary of topics addressed within and also identifies potential action items for the client's further consideration. The Financial Planning Service utilizes a software tool to help complete the analysis.

**Retirement Goal Planning:** A retirement goal plan helps the client develop a retirement savings strategy by providing asset allocation recommendations for assets identified by the client as earmarked for retirement. Essentially, it is intended to help clients answer three key questions: (1) whether the client is on track to meet their financial goals; (2) how the client could allocate their retirement assets; (3) how the client could take action. The analysis is based primarily on a client's risk tolerance, time horizon, net worth, cash flow, retirement holdings, and goals and objectives.

For any retirement goal plan, the plan will analyze the client's current asset allocation and funding strategy in light of client's objective, time horizon and risk tolerance and propose an alternative strategy where appropriate. The plan will estimate the likelihood of meeting the client's financial goals for both the current strategy and any alternative proposal. These estimates rely upon assumptions concerning future events such as tax status and the rate of inflation, and while based upon accepted principles of portfolio management, is by no means a guarantee of future results.

If client's assets held outside of TRA or its affiliates are reflected in the review, that information is included for informational purposes only and is based on data provided by the client. TRA does not independently verify this information. Accordingly, the estimates depend on the accuracy and completeness of the information provided by the client.

The analysis may or may not include a written report. Where a report is provided, the content and detail of the report may vary. TRA does not monitor the recommendations provided by a retirement goal plan. As a general matter, the client may participate in a new analysis session on an annual basis, at TRAs' discretion. In limited circumstances, TRA may decide to provide clients with the opportunity to undergo a new analysis more frequently than annually. A retirement goal plan is not a substitute for a comprehensive financial plan and the client should not rely upon the analysis as the client's sole source for retirement planning.

Asset Allocation Review: The asset allocation review provides a detailed analysis of a client's existing investment portfolio. It is designed to help the client assess his or her current holdings against a customized benchmark that is derived from the client's responses to a risk tolerance questionnaire. A report may be produced from the asset allocation review that analyzes a client's holdings by asset class, investment style, sector weighting, regional exposure, performance history, and risk analysis.

In developing the asset allocation review, TRA uses a software tool where all calculations use asset class returns, not returns of actual investments. The average annual historical returns are calculated using indices, which serve as proxies for their respective asset classes. The portfolio returns are calculated by weighting individual return assumptions for each asset class according to a client's portfolio allocation.

The return assumptions in the software tool are not reflective of the actual performance of any specific investment or portfolio and do not include any fees or expenses that may be incurred by investing in specific products. The actual returns of a specific product may be more or less than the returns used by the software tool. It is not possible to directly invest in an index. Financial forecasts, rates of return, risk, inflation, and other assumptions may be used as the basis for illustrations. They should not be considered a guarantee of future performance or a guarantee of achieving overall financial objectives. Past performance is not a guarantee or a predictor of future results of either the indices or any particular investment. The projections and other information generated about the likelihood of various investment outcomes are hypothetical and may vary with each analysis over time. Moreover, actual results may vary significantly depending upon any changes in client's circumstances and economic trends.

The asset allocation review is appropriate for clients holding larger, complex portfolios. TRA is available to work with clients to determine whether the client's holdings may benefit from an asset allocation review and which holdings to include. Information about the client's assets held outside of TRA and/or its affiliates that is reflected within the review is for informational purposes only, based solely on data provided by the client. TRA does not independently verify that information.

The asset allocation review can take into account mutual funds, exchange traded funds, common stock, closed end funds and variable annuities, but not individual bonds, alternative investments or preferred stocks (in some cases, TRA may use a broader index as a proxy for these holdings). TRA does not monitor the asset allocation review's guidance, provide any updates or provide any reports, other than the report associated with the asset allocation review.

**Insurance Analysis:** The plan can evaluate whether the client has sufficient income or capital established to cover surviving beneficiaries' cash flow needs. With respect to life insurance, after an evaluation, TRA can thereafter work with the client to identify possible insurance solutions to insurance needs that may have arisen in the insurance analysis. TRA may refer the client to an affiliate, Oncor Insurance Services, LLC ("Oncor"), to help them meet their insurance needs. While Oncor will conduct an insurance needs analysis, clients should understand and be aware that Oncor's primary business objective is to market and sell Transamerica insurance products. Accordingly, if a third party insurance product and a Transamerica product were potentially appropriate products to recommend to a client, Oncor would recommend the Transamerica product in lieu of the third party product.

## **Fees and Compensation**

### **Third Party Money Management**

Clients pay advisory fees agreed to in the applicable TPMM investment management agreement, which is signed by the Client. The TPMM calculates the fees owed by the client and directs the custodian to deduct the appropriate fee. Depending on the custodial arrangement in place for the TPMM, the TPMM in turn either compensates TRA directly in the form of a solicitor's fee or directs the custodian to pay a portion of the advisory fee to TRA. If paid in the form of a solicitation fee, clients receive a Solicitor's Disclosure Statement that describes the fee paid to TRA by the TPMM. TPMMs will typically require that clients authorize automatic fee deduction from the advisory account. In many cases, the TPMMs will also charge fees on cash positions held within client accounts. Clients should refer to the TPMM's Form ADV Part 2A or other Disclosure Brochure for a complete discussion of the fees and termination procedures associated with the particular advisory program in which they will participate. Our Advisors do not establish the fee attributable to the TPMM or the termination procedures for a TPMM. Additionally, all fees paid by a client to a TPMM for portfolio management services are separate and distinct from the fees and expenses charged by mutual funds invested in by the TPMM or custodial fees charged (discussed

more below). In cases where shares of mutual funds or exchange-traded funds are included in clients' portfolios, clients may also be subject to fees and expenses charged directly by the mutual fund or exchange-traded fund. Such fees may include, but are not limited to, management fees, fund operating expenses, distribution fees, and 12b-1 fees.

Generally the client's total fee for a TPMM program will be no greater than 3%.

Participation in Third-Party Money Management advisory services offered through TRA may cost you more than purchasing similar services directly through a TPMM. However, certain TPMM services may not be offered directly to clients and may only be available through a soliciting investment advisor such as TRA. In addition, TRA provides oversight of a client's account as well as on-going financial planning services.

TPMMs will use a separate custodian. As stated above, the custodian will deduct the advisory fee directly from your account based on instructions from the TPMM. In addition to advisory fees, clients may be subject to custodial fees that may include, but are not limited to, transaction charges, IRA fees and other account or administrative fees. Please refer to your account establishment paperwork, custodial account paperwork, and/or TPMM's Form ADV Part 2A or similar disclosure brochure for additional details on fees and expenses.

You will receive quarterly statements (or notification that your statements are available to view online) directly from the account custodian. These statements will show all transactions, positions and credits/debits (deposits/withdrawals) in your account. These statements will reflect deductions for advisory fees paid by you to the TPMM and to us.

### **Financial Planning Services.**

Depending on the advisory service, TRA provides the service to clients either for no additional cost, as a part of a bundled retirement plan recordkeeping service administered by its affiliate recordkeeper, TRSC, or for a fee of up to \$2,500. TRA reserves the right to discount client fees.

### **Performance-Based Fees and Side-by-Side Management**

Neither TRA nor any of its advisory personnel charge performance-based fees with respect to the accounts which they manage.

### **Types of Clients**

Through the Third-Party Money Manager Programs, we generally provide investment advisory services to individuals. However, we may provide advisory services to corporations or other



businesses, trusts, estates, and charitable organizations. While there are exceptions, there is generally a minimum account size of \$150,000.

TRA primarily provides Financial Planning Services to individuals who have a pre-existing relationship with TRA or one of its affiliates, often by participating within a TRSC-administered employer sponsored retirement plan. However, TRA also provides Financial Planning Services to other individuals, such as family and friends of existing clients, individuals without a pre-existing relationship with TRA or its affiliates, and small organizations such as trusts, corporations, limited liability companies, partnerships, small retirement plans and similar entities.

## **Methods of Analysis, Investment Strategies, and Risk of Loss**

### **Third Party Money Management**

Advisors may assist you in selecting a TPMM and a portfolio strategy based on your situation and objectives within the context of income and growth needs and expectations, time horizon, temperament, other sources of income, and other assets and liabilities. Assistance may also be provided to you in explaining the differences among the TPMMs available. Advisors may also provide assistance to you by explaining any special instructions for the management of the assets in your account; in understanding the investment management process, investment objectives, and the investment strategies undertaken as part of the service; in reviewing and completing the written materials required by the TPMM; in monitoring reports, statements and performance results; in monitoring your ongoing needs and financial situation; and in answering questions about the service.

We select TPMMs who are registered investment advisors using the following criteria

- Investment philosophy and strategy of TPMM
- Historical performance record of TPMM portfolios using rolling returns of varying time periods
- Comparison of performance track records of TPMMs against their peers and benchmarks
- Costs
- Tenure of key TPMM managers
- Breadth and depth of TPMM personnel
- Firm culture
- Regulatory status and reputation
- Transparency and communication with us

The methods of analysis, sources of information and investment strategies used by TPMMs will vary among managers. We encourage you to read each manager's Disclosure Brochures, Form ADV, Part 2A's and any other document you receive prior to entering into an agreement with a third-party money manager. Third-Party Money Managers will exercise discretion over your account assets.

A risk associated with the TPMM service is that past performance is not a guarantee of future results. While a TPMM may have demonstrated a certain level of success in past economic times, the TPMM may not be able to replicate that success in future markets. In addition, just because a TPMM may have invested in a certain manner in past years, such TPMM may deviate from its strategy in future years. To mitigate this risk, TRA attempts to select TPMMs with proven track records that have demonstrated a consistent level of performance and success. TRA also conducts annual due diligence on the TPMMs.

There is also a risk that an Advisor may mismatch a TPMM and/or strategy to a client. To mitigate this risk, a TRA Advisor collects written information on each client, to the extent the client makes it available, to aid with his or her recommendation.

### **Financial Planning Services**

TRA bases its Financial Planning Services upon a combination of quantitative and qualitative investment methodologies. This means that its advice is based on measurable metrics, such as historical return, risk and portfolio holdings analysis. Although financial planning advice is based upon strategies consistent with prudent long term investing and diversification principles, any investment is subject to a risk of loss that clients should be prepared to bear.

TRA utilizes a software tool that uses several methods of calculating results, each of which provides one outcome from a wide range of possible outcomes. The software uses “Monte Carlo” simulations that are used to show how variations in rates of return each year can affect a client’s results. A Monte Carlo simulation calculates the results of a client’s plan by running it many times, each time using a different sequence of returns. Some sequences of returns will produce better results, and some will produce worse results. These multiple trials provide a range of possible results, some successful (i.e. a client would have met all his or her goals) and some unsuccessful (a client would not have met all of his or her goals). Because the results are calculated over many years, small changes can create large differences in future results.

All results in this report are hypothetical in nature, do not reflect actual investment results, and are not guarantees of future results. All results use simplifying assumptions that do not completely or accurately reflect a client’s specific circumstances. No plan or report has the ability to accurately predict the future. As investment returns, inflation, taxes, and other economic conditions vary from assumptions, a client’s actual results will vary (perhaps significantly) from those presented.

The Financial Planning Service does not provide legal, tax, or accounting advice. Before making decisions with legal, tax, or accounting ramifications, a client should consult appropriate professionals for advice that is specific to his or her situation.

## Disciplinary Information

During the past ten years, there have been no legal or disciplinary events involving TRA or its advisory personnel that are material to TRA's advisory business.

## Other Financial Industry Activities and Affiliations

TRA is an indirect wholly-owned subsidiary of AEGON USA, LLC. Various direct or indirect subsidiaries of AEGON are engaged in investment advisory, brokerage, banking or insurance businesses. TRA may have material business arrangements with these subsidiaries, including the following subsidiaries.

*Oncor Insurance Services, LLC.* Oncor Insurance Services, LLC ("Oncor"), is a wholly owned subsidiary of AEGON, and an affiliate of TRA. Oncor is engaged in selling insurance products. In the course of providing Financial Planning Services to our clients, TRA investment advisor representatives may refer clients to Oncor for help with their insurance needs. TRA may be compensated for this referral. In addition, Oncor may recommend insurance products to TRA clients that are offered by certain insurance company subsidiaries of AEGON, including products offered by Transamerica Financial Life Insurance Company and Transamerica Life Insurance Company as discussed below. Oncor's primary objective is to sell Transamerica insurance products. Oncor may recommend proprietary insurance products that meet certain specific criteria based on an analysis of the client's needs, even though other non-proprietary products are available that might provide equivalent or potentially better benefits.

*Transamerica Investors Securities Corporation.* Transamerica Investors Securities Corporation ("TISC"), formerly known as Diversified Investors Securities Corp., is a registered broker-dealer and a wholly-owned subsidiary of TRSC. Almost all of TRA's Advisors are licensed registered representatives of TISC.

*Transamerica Financial Advisors, Inc.* Transamerica Financial Advisors, Inc. ("TFAI") is a registered broker-dealer and is an indirect wholly-owned subsidiary of AEGON. Prior to January 1, 2014, the TRA Advisors were TFAI investment advisory representatives and offered the TPMM service through TFAI. In the course of providing service to certain legacy clients, certain TPMMs may continue to be serviced through TFAI.

*Transamerica Financial Life Insurance Company.* Transamerica Financial Life Insurance Company ("TFLIC") is an indirect wholly-owned subsidiary of AEGON, as is TRA. TFLIC is engaged in selling variable and fixed annuities and life insurance. TFLIC products may be held by TRA clients.

In order to market these products, TRA employees and agents are appointed through TRIA as licensed insurance agents of TFLIC as necessary. These individuals will not receive commissions for the sale of these products to advisory clients.

*Transamerica Life Insurance Company.* Transamerica Life Insurance Company ("TLIC") is an indirect wholly-owned subsidiary of AEGON, as is TRA. TLIC is engaged in selling variable and fixed annuities and life insurance. TLIC products may be held by TRA clients. In order to market these products, TRA employees and agents are appointed through TRIA as licensed insurance agents of TLIC as necessary. These individuals will not receive commissions for the sale of these products to advisory clients.

*Transamerica Retirement Insurance Agency, Inc.* Transamerica Retirement Insurance Agency, Inc. ("TRIA") is a registered insurance agency wholly-owned subsidiary of TRSC. In certain cases, some of our officers and Advisors may be personally affiliated with our affiliated insurance companies/agencies. When you purchase insurance products through an Advisor that is acting in his or her capacity as an insurance agent, TRIA will receive commission compensation. However, our Advisors do not receive commissions for sales of insurance products.

*Transamerica Asset Management, Inc.* Transamerica Asset Management, Inc. ("TAM") is an indirect wholly-owned subsidiary of AEGON. TAM serves as an investment adviser to a family of mutual funds known as the Transamerica Funds.

TRA or its affiliates are subject to potential conflicts of interest if proprietary mutual funds, insurance company accounts, or collective trust funds sponsored by AEGON affiliates are included as investment options in a TPMM. If a TPMM were to include proprietary mutual funds in its portfolios, TRA may have an interest in recommending such TPMM. Currently, a TPMM does not invest in a proprietary fund including the Transamerica Funds.

If a TPMM has a marketing and referral agreements with us, they may attend, contribute to, or sponsor education and training meetings for our Advisors. A TPMM may reimburse us for up to 100% of the cost of these meetings. These contributions and reimbursements create a potential conflict of interest because meeting sponsors have more opportunities to provide our Advisors with education on investments, their investment management services, industry trends, and other issues and because we benefit from these contributions and reimbursements.

TRA or its affiliates may be compensated and are therefore subject to a potential conflict of interest if proprietary insurance company products are purchased as a result of a Financial Planning Services analysis. Additionally, TRA and its affiliate, Oncor, are subject to a conflict of interest when conducting an insurance analysis that results in a referral to Oncor. As previously discussed, while Oncor will conduct an insurance needs analysis, Oncor's primary business objective is to market and sell Transamerica insurance products. Oncor may recommend proprietary insurance products that

meet certain specific criteria based on an analysis of the client's needs, even though other non-proprietary products are available that might provide equivalent or potentially better benefits.

### **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

TRA has adopted a code of ethics (the "Code") under Rule 204A-1 under the Investment Advisers Act of 1940, which sets forth certain restrictions and standards of conduct for TRA's advisory personnel. While the Code permits such employees to invest in securities that may be held or acquired by TRA's advisory clients, it prohibits specific types of personal securities transactions that may give rise to substantial conflicts of interest. It also establishes reporting requirements through which certain employees provide information to TRA on their personal securities transactions. More generally, the Code prohibits any employees from taking inappropriate advantage of his or her position with TRA and provides that TRA may sanction employees who violate the Code. Any client or prospective client may obtain a copy of the Code (without charge) by calling 866-368-0566 or writing to us at Transamerica Retirement Advisors, Inc., 408 St. Peter Street, Suite 230, St Paul, Minnesota 55102.

TRA may also be subject to a conflict of interest if clients invest in investment funds that are sponsored or advised by affiliates. However, we believe this conflict is mitigated because only the TPMM makes discretionary decisions about which investment options to purchase and sell, not TRA.

TRA or its affiliates are also subject to a potential conflict of interest if proprietary insurance company products are purchased as a result of a Financial Planning Services analysis. Clients can request more information on any compensation received by the firm in connection with referrals received with respect to insurance products.

### **Brokerage Practices**

Transactions in investment funds for the TPMM programs are executed through an unaffiliated clearing broker dealer, which may be TD Ameritrade or Pershing, LLC. TRA does not receive research or other soft dollar benefits from broker-dealers that place mutual fund transactions.

### **Review of Accounts**

#### **Third Party Money Management Program**

Review of client accounts will be conducted at least on an annual basis and upon client request. Reviews will be conducted by an Advisor.

Please refer to your applicable TPMM's Form ADV Part 2A or similar disclosure document for information related to the TPMM's review of its accounts.

Annually, TRA delivers an Annual Due Diligence Questionnaire to all TPMMs with which we have agreements. TRA reviews these questionnaires with our Investment Policy Committee. This Committee may vote to retain or reject a Third-Party Money Manager if material irregularities are noted during a review. The Committee will also review publically available information on at least an annual basis, and more frequently, if necessary, to ensure such manager is still an appropriate manager for the TPMM program.

### **Financial Planning Services**

Financial Planning Services are provided to clients on a one-time or periodic basis, meaning it is provided to a client based on the client's needs at a particular point in time. As a result, there is no ongoing monitoring of a client's situation or needs. The services are non-discretionary, meaning the client must affirmatively act to implement TRA's recommendation.

## **Types of Reports**

### **Third Party Money Management**

You will receive periodic account statements, transaction confirmations, and/or performance reports. The nature and frequency of client reports will vary by the TPMM. We urge you to carefully review these reports and compare your custodial statements with your performance reports. The information in your performance reports may vary from your custodial statements due to accounting procedures, reporting dates, or valuation methodologies of certain securities. In the event of any discrepancies you should rely on the statements you receive from the custodian of your assets.

### **Financial Planning Services**

The financial plan may include some or all of the following topics: retirement goal funding, asset allocation review and insurance analysis. The plan will provide a summary of topics addressed within and also identifies potential action items for the client's further consideration.

## **Client Referrals and Other Compensation**

On occasion, persons who are not associated with us refer their clients to TRA. We enter into solicitor agreements with these third persons pursuant to Rule 206(4)-3 of the Investment Advisers Act of 1940. TRA will compensate that person/solicitor directly if you agree to accept our advisory services. A portion of your advisory fee will be paid to this solicitor. At the time of the referral your

solicitor will provide you with a compensation statement disclosing the terms of his/her agreement with us.

In the course of providing Financial Planning Services to our clients, TRA investment advisor representatives may refer clients to Oncor for help with their insurance needs. TRA may be compensated for this referral.

### **Custody**

For all services discussed in this brochure, TRA does not have custody over funds held in client accounts, and does not hold physical custody of any of these funds. Regarding Third-Party Money Management Services, funds are held with an independent qualified custodian. You will receive account statements at least quarterly from the custodian. Clients should carefully review account statements for accuracy.

### **Investment Discretion**

TRA does not accept discretionary authority with the accounts opened through its TPMM relationships or within its financial planning services. TPMMs maintain discretionary authority, but such authority would be fully disclosed to clients in the TPMMs Form ADV Part 2A or other disclosure document.

### **Voting Client Securities**

TRA does not accept authority to vote proxies on investment funds held in client accounts. Regarding TPMM Services, you should refer to the third-party money managers' disclosure documents for a complete description of their proxy voting procedures. These documents will explain whether you will receive proxies or other solicitations directly from the custodian.

### **Financial Information**

We are not subject to any financial condition that is reasonably likely to impair our ability to meet our commitments to clients.