

SIGNATOR INVESTORS, INC.
Member FINRA, SIPC
A Registered Investment Adviser

Form ADV Part 2A

Investment Advisory Services Brochure

February 11, 2015

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This Brochure provides information about the qualifications and business practices of Signator Investors, Inc. If you have any questions about the contents of this Brochure, please contact us at 1-888-333-3087. 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.

Signator Investors, Inc. 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 provides you with information about which you determine to hire or retain an Adviser.

Additional information about Signator Investors, Inc. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Summary of Material Changes

There have been no material changes since Signator Investors, Inc.'s annual update in March 2014.

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Item 4. Advisory Business

Information about Signator Investors, Inc.

Signator Investors, Inc. (“SII”) is a registered investment adviser with the Securities and Exchange Commission (“SEC”) that has been in existence since 1999. SII is also dually registered as a broker-dealer and is registered with the Financial Industry Regulatory Authority (“FINRA”), the SEC and various states.

SII is wholly owned by John Hancock Financial Network, Inc. John Hancock Financial Network is wholly owned by John Hancock Life Insurance Company (U.S.A), which is ultimately owned by Manulife Financial Corporation.

For more information about SII’s affiliations, please see Item 10. Other Financial Industry Activities and Affiliations.

Firm Management

The following individuals serve as officers and principals of the firm. In addition, these individuals are Principal Executive Officers of the investment adviser. Their responsibility is to direct and supervise the activities of SII:

Christopher Maryanopolis, born in 1964, is President, CEO and Chief Operating Officer of SII. He holds a BA from SUNY at StonyBrook University of StonyBrook, New York and a Masters of Business Administration from Fordham University of New York, New York.

Thomas J. Horack, born in 1953, is Chief Compliance Officer of SII. He holds a BS from Babson College of Wellesley, Massachusetts.

Services Offered

SII and its Investment Adviser Representatives (“IARs”) offer the following services:

- Managed Account Programs
- Money Management Seminars & Newsletters
- Financial Planning
- Consultative Services
- Defined Contribution Consulting

Please see below for a full description of the investment advisory services through SII and its IARs.

For information about the investment advisory process for each program, please see Item 8. Methods of Analysis, Investment Strategies and Risk of Loss.

For information regarding the fees for each program, please see Item 5. Fees and Compensation.

Managed Account Programs

SII has agreements with various third-party asset managers, acts as a discretionary investment manager, and makes those services available through its IARs. SII and the IAR will receive a portion of the management fees charged to the client. Below please find a description of the asset management programs offered through SII to the public.

Portfolio by Design Program

Overview

The Portfolio by Design (“PBD”) program offers mutual fund and exchange traded fund wrap programs, a unified managed account program and separate account programs. SII is the sponsor. Envestnet Portfolio Solutions, Inc. (“Envestnet Portfolio Solutions”) is the Registered Investment Adviser. The investment manager is Envestnet Portfolio Solutions. Envestnet Portfolio Solutions is located at 35 E. Wacker Dr., Suite 2400, Chicago IL 60601. Envestnet Portfolio Solutions’ Form ADV Part 2A is given to clients and prospective clients of the PBD program and contains specific details about Envestnet Portfolio Solutions and its investment advisory qualifications and services. For additional information about Envestnet Portfolio Solutions, please see Envestnet Portfolio Solutions’ Form ADV Part 2A.

Products

Through the PBD program, SII IARs may offer five products:

- PBD Premier Manager (“Premier Manager”)
- PBD Premier Advisor Separately Managed Account Program (“Premier Advisor”)
- PBD Premier Manager Income Portfolios
- Unified Managed Account (“UMA”)
- ActivePassive Portfolios

SII also provides investment advisory services on PBD Premier Select and PBD Premier Adviser Mutual Fund. Currently, the PBD Premier Select and PBD Premier Adviser Mutual Fund programs are closed to new clients.

Premier Manager

Premier Manager is an Envestnet Portfolio Solutions model driven mutual fund program that allows the client to invest in a broad range of funds through National Financial Services. This program is managed by Envestnet Portfolio Solutions. Therefore, Envestnet Portfolio Solutions is granted investment discretion and will continuously monitor each client portfolio. When deemed appropriate, Envestnet Portfolio Solutions will make changes in both asset class allocations and specific investment selections. Envestnet Portfolio Solutions will also periodically rebalance the portfolios.

Premier Advisor

Premier Advisor is an IAR directed mutual fund and separately managed account program. Like Premier Manager, Premier Advisor offers a broad selection of funds through National Financial Services as well as a wide variety of separately managed account strategies. Through the Premier Advisor program, the client retains full discretion over the implementation of the IAR’s recommendations and the rebalancing of the account.

For clients in the Premier Advisor program, the IAR makes recommendations for changes in both asset class allocations and specific investment or manager selections. The client may accept these recommendations or decline to implement the recommendations. This program is closed to new clients.

UMA

The UMA program allows the client access to an Envestnet Portfolio Solutions model driven program which can consist of separately managed accounts, mutual funds and exchange traded funds. The UMA models are constructed by Envestnet Portfolio Solutions, and investment discretion is granted to Envestnet Portfolio Solutions. Additionally, Envestnet Portfolio Solutions in-house overlay portfolio management team supervises and aggregates the investment decisions of the multiple managers.

ActivePassive Portfolios

The ActivePassive Portfolios are Envestnet Portfolio Solutions models that combine passively managed investments with actively managed mutual funds. The portfolios are managed by Envestnet Portfolio Solutions consisting of a series of third party index mutual funds as well as one or more actively managed funds from the PMC Fund family. The PMC Funds are a proprietary fund family of Envestnet Portfolio Solutions' affiliate, Envestnet Asset Management, Inc. (EAM) and as the investment advisor to the PMC Funds, EAM receives a management fee based on the assets in the PMC Funds. Envestnet Portfolio Solutions does not receive compensation for the portion of assets in the ActivePassive Portfolios that are invested in the PMC Funds. Envestnet Portfolio Solutions is granted investment discretion which allows Envestnet Portfolio Solutions to make securities changes and rebalance the portfolios when necessary.

Income Portfolios

Like the ActivePassive Portfolios, the Income Portfolios program is an Envestnet Portfolio Solutions model driven mutual fund program. However, unlike the ActivePassive Portfolios program, the Income Portfolios is made up solely of mutual funds. Envestnet Portfolio Solutions is the manager and is granted investment discretion for this program. Envestnet Portfolio Solutions monitors the account's securities selections and asset allocation. When necessary, Envestnet Portfolio Solutions will make securities selection changes and rebalance the portfolios.

See Appendix 1 Portfolio by Design Wrap Fee Program Brochure for more information on the program.

John Hancock Portfolio Solutions Program

Overview

The John Hancock Portfolio Solutions ("JHPS") is a mutual fund and exchange-traded fund ("ETF") managed account program. The sponsor and discretionary investment manager of the JHPS program is Signator Investors, Inc. ("SII"). Manulife Asset Management ("MAM") is the model provider recommending mutual fund and ETF model portfolios to SII for the JHPS program. John Hancock Investment Management, LLC ("JHIM") provides research related to the mutual funds and ETFs SII includes in the model portfolios.

JHPS Program

SII manages the JHPS program which offers individual clients actively managed portfolios comprised of mutual funds and ETFs. SII is granted investment discretion. MAM, an affiliate of SII, provides SII with recommended model investment portfolios based on specific investment strategies and may, from time to time, recommend changes to asset class allocations and specific mutual fund and ETF selections. JHIM, an affiliate of SII, provides research related to the mutual funds and ETFs that SII includes in the model portfolios. SII's Investment Committee uses a number of analytical tools and software applications in determining whether to follow those recommendations. Some of the factors considered are historical rates of risk and return for various asset classes, correlation across asset classes and risk premiums. SII will solely determine whether to follow those recommendations. SII will also periodically rebalance and reallocate the portfolios. Once a reallocation or rebalance is determined it will occur at the then current quarter end.

SII has solicitor arrangements with third party advisers to make JHPS available to the third party adviser's clients.

See Appendix 2 John Hancock Portfolio Solutions Wrap Fee Program Brochure for more information on the program.

Signator Managed Account Platform

Overview

The Signator Managed Account Platform offers mutual fund and/or exchange traded fund programs and advisor directed portfolios. SII is the Sponsor. Envestnet Asset Management, Inc. (“Envestnet Asset Management”) is the Registered Investment Adviser. Envestnet Asset Management is located at 35 E. Wacker Dr., Suite 2400, Chicago IL 60601. Envestnet Asset Management Form ADV Part 2A is given to clients and prospective clients of the program and contains specific details about Envestnet Asset Management and its investment advisory qualifications and services. For additional information about Envestnet Asset Management, please see Envestnet Asset Management’s Form ADV Part 2A.

Products

- Advisor Managed Portfolios
- Strategist Managed Portfolios

Advisor Managed Portfolios

The Advisor Managed Portfolios Program is designed to provide clients with diversified portfolios of mutual funds, exchange traded funds, stocks and bonds managed by SII through its IARs. Envestnet Asset Management provides the technology platform on which the program functions and is only providing administrative services to SII for this program.

Advisor Managed Portfolios is an IAR directed mutual fund, exchange traded funds, stocks and bonds managed account program. The Program is offered on a discretionary or non-discretionary basis as determined by the client. For discretionary accounts, client grants SII through its IAR full authority to invest, reinvest and allocate and reallocate assets in the account that are part of the Program. Such discretionary authority allows the IAR to make all investment decisions with respect to the account and when deemed appropriate and without prior consultation with the client, to buy, exchange, convert and otherwise trade in any stocks, bonds, mutual funds and other securities. If a client does not grant discretionary authority, then any transaction or investment must be reviewed and approved by the client in advance. SII, in its sole discretion may determine certain accounts that will not be eligible for discretion and discretion may be revoked in writing.

Strategist Managed Portfolios

Strategist Managed Portfolios is an asset allocation program which offers both taxable and tax sensitive portfolios of mutual funds and/or exchange traded funds positioned at various points along the risk/return spectrum. These portfolios are managed by third party investment advisors (“Model Provider”) and SII elects the model portfolios available in the program.

Clients acknowledge that neither SII nor Envestnet Asset Management can guarantee the continued availability of third party model portfolios. The Model Providers are responsible for all investment selections and they may add or remove securities from their portfolios at their sole discretion.

Clients may select model portfolios offered by the following third party providers but not limited to: AlphaSimplex, Astor Investment Management, LLC, Beaumont Financial Partners, LLC, Brinker Capital, Inc., Clark Capital, Morningstar Investment Services, Inc., Russell Investment Management Company, Standard & Poors Investment Advisory Services, LLC, Symmetry Partners, Vanguard and Wilshire Associates Incorporated. For additional information about these Model Providers, please see the respective Form ADV Part 2A.

See Appendix 3 Signator Managed Account Platform Wrap Fee Program Brochure for more information on the program.

SEI Asset Management Program

Overview

SII has an agreement with SEI Investments Management Corporation, SEI Investments Distribution Company and SEI Trust Company (collectively “SEI”) that allows SII’s IARs to offer SEI’s mutual fund asset allocation programs and separate account programs to SII clients.

SEI is located at 100 Cider Mill Road, Oaks, PA 19456. SEI’s Form ADV Part 2A is given to clients and prospective clients and contains specific details about SEI and its investment advisory qualifications and services. For additional information about SEI, please see SEI’s Form ADV Part 2A.

Products

Through SEI, SII IARs may offer two programs:

- SEI Mutual Fund Models Program
- SEI Managed Account Program (“MAP”)

When needed, SEI will rebalance the accounts in the programs to maintain the target allocation. If there is a proposed model, strategy or portfolio manager change, SEI will notify the IAR who will, in turn, discuss the reasons for the change with the client. If the client does not agree to the change, the model, strategy or portfolio manager change will not occur.

SEI Mutual Fund Models Program consists of the following:

SEI Goal Link

The SEI Goal Link is a fund of funds investment solution that focuses on the client’s goals. Through SEI Goal Link, SII IARs assist clients with selecting investment strategies that aim to meet the client’s investment objectives. The program consists of SEI fund of funds that allow the client to invest in several SEI mutual funds while only owning one fund. SEI is granted investment discretion, and when necessary, SEI will rebalance the accounts to maintain the target allocation.

SEI Private Client Models

Through SEI Private Client Models, SII IARs assist clients with selecting investment strategies that aim to meet the clients’ investment objectives. The program consists of asset allocation models that are made of SEI mutual funds and designed for wealth preservation and wealth accumulation. SEI is granted investment discretion and, when necessary, SEI will rebalance the accounts to maintain the target allocation.

SEI Institutional Models

Through the SEI Institutional Models, SII IARs assist clients with selecting asset allocation strategies that aim to meet the clients’ investment objectives. The strategies are diversified among a wide variety of asset classes across the equity/fixed income spectrum to maximize returns relative to standard deviation. SEI mutual funds are the underlying investment vehicles.

SEI Managed Account Program (MAP)

The SEI MAP is a separately managed account program that uses style specific managers. SEI appoints portfolio managers to manage the assets in accordance with the guidelines of the managed account strategy mandates. SEI is granted investment discretion and, when necessary, SEI will rebalance the accounts to maintain the target asset allocation. Clients may also elect Automated Tax Management (ATM) which coordinates activities across all equity managers selected for the portfolio.

Solicitation Arrangements

Brinker Capital

Overview

SII acts as a solicitor on behalf of Brinker Capital. Brinker Capital is granted investment discretion for all of the programs offered through SII.

Brinker Capital is located at 1055 Westlakes Drive, Suite 250, Berwyn, PA 19312. Brinker Capital's Form ADV Part 2A is given to clients and prospective clients and contains specific details about Brinker Capital and its investment advisory qualifications and services. For additional information about Brinker Capital, please see Brinker Capital's Form ADV Part 2A.

Products

Through Brinker Capital, SII IARs may offer six investment solutions:

- Core Asset Manager Program
- Destinations Program
- Personal Portfolios Program
- Crystal Strategies Program
- Personal Benchmark Program
- Retirement Plan Services

For more information about the programs listed above, please see Brinker Capital's Form ADV Part 2A.

Signature Investment Advisors, LLC

Overview

SII acts as a solicitor on behalf of Signature Investment Advisors, LLC.

Signature Investment Advisors, LLC, a subsidiary of Signature Estate and Investment Advisors, LLC, is located at 2121 Avenue of the Stars, Suite 1600, Los Angeles, CA 90067. Signature Investment Advisors, LLC's Form ADV Part 2A is given to clients and prospective clients and contains specific details about Signature Investment Advisors, LLC and its investment advisory qualifications and services. For additional information about Signature Investment Advisors, LLC, please see Signature Investment Advisors, LLC's Form ADV Part 2A.

Products

Through Signature Investment Advisors, LLC, SII IARs may offer two investment solutions:

- Signature Allocation Series
- Signature Elite

Signature Investment Advisors, LLC is granted discretion for the Signature Allocation Series, and the client retains discretion for the Signature Elite Program.

For more information about the programs listed above, please see the Signature Investment Advisors, LLC Form ADV Part 2A.

Curian Capital, LLC

Overview

SII acts as a solicitor on behalf of Curian Capital, LLC for the Custom Style Program. The Program is available either in Custom Portfolios or Select Portfolios.

Curian Capital, LLC is located at 7601 Technology Way, Denver, CO 80237. Curian Capital, LLC's Wrap Fee Program Brochure is given to clients and prospective clients and contains specific details about Curian Capital, LLC and its investment advisory qualifications and services. For additional information about Curian Capital, LLC, please see Curian Capital LLC's Wrap Fee Program Brochure.

The Pacific Financial Group, Inc.

Overview

SII acts as a solicitor on behalf the Pacific Financial Group, Inc. for Retirement Plan Management. The Pacific Financial Group, Inc. is a 3(21) Investment Adviser under ERISA when managing assets with a Brokerage Window (Self Directed Option or Self Directed Brokerage Account)

The Pacific Financial Group is located at 777 108th Avenue NE Suite 2100, Bellevue, WA 98004. For more information, please see the Pacific Financial Group's Form ADV Part 2A.

Other Programs

Seminars & Newsletters

SII IARs may offer generic financial education seminars to the public. Seminars are approved by the home office of SII. The seminars generally consist of generic discussion of financial strategies using a wide variety of investment and insurance products. There is no charge for attendance, but there may be a charge for materials provided. SII also allows its IARs to send newsletters to their clients or prospective clients. These newsletters may be prepared by an approved third party newsletter service. There is no charge for these newsletters. Aside from these newsletters, SII and its IARs do not issue proprietary reports, charts, graphs, formulas or other devices that clients may use to evaluate securities.

Financial Planning

Qualified IARs, who are also part of SII's Financial Planning Program, can offer financial planning on a case by case basis for specific client needs. These financial plans may provide recommendations on the client's overall investment allocation, insurance needs as well as other financial matters.

SII defines financial planning in a broad sense as services that typically involve assisting clients in identifying long-term economic goals, analyzing their current financial situation, and recommending a comprehensive financial program to achieve those goals.

Consultative Services

Certain IARs who are also part of SII's Financial Planning Program may offer clients consultative services and provide general investment advice or guidance to clients in accordance with a written service agreement. The consulting services may include one or more of the following financial planning topics:

- asset allocation
- estate planning
- retirement planning
- accumulation goal planning

Defined Contribution Consulting

Certain IARs in SII's Defined Contribution Consulting ("DCC") program provide services to retirement plans ("Plans") and their participants on behalf of SII. The plan sponsor (or the responsible plan fiduciary if that person is not the plan sponsor) executes a DCC advisory agreement ("Advisory Agreement") on behalf of the Plan with SII to designate, among other things, the services ("Services") it will receive from SII. Services are composed of two types, Fiduciary Services and Non-Fiduciary Services.

To the extent it performs Fiduciary Services selected by the Plan, SII is providing non-discretionary investment advice only and acting as a fiduciary with respect to the Plan under the Employee Retirement Income Security Act of 1974 ("ERISA"), the federal law governing pension plans). The Plan retains the sole final decision making authority to accept or reject the non-discretionary advice or recommendations delivered by SII. Fiduciary Services are delivered with respect to the particular needs of each Plan and its participants, for the purpose of providing retirement income, based on generally accepted investment theories and prevailing investment industry standards.

For "non-fiduciary services" selected by the Plan, SII is not acting as an ERISA fiduciary.

Fiduciary Services include investment advice for the selection, monitoring, and replacement of investment options, and the development of an investment policy statement for the Plan. Non-fiduciary services include financial education of Plan participants about investments generally or Plan investment options, but are not rendered by SII as individualized investment advice for any particular participant. Non-fiduciary services also include general assistance with group enrollment meetings for employees, or plan-level consulting services such as fee and expense evaluation, vendor analysis or general support for plan design features. The Advisory Agreement will specify the Fiduciary Services and Non-Fiduciary Services selected by the Plan, and SII has no authority or responsibility to provide any other services.

Assets Under Management

As of 10/01/2014, Signator Investors, Inc. had \$974,599,900 in non-discretionary assets under management.

As of 10/01/2014, Signator Investors, Inc. had \$213,947,168 in discretionary assets under management.

Item 5. Fees & Compensation

Signator Investors, Inc. ("SII")

SII receives compensation through its Managed Account Programs, Financial Planning Program, Consultative Services Program and the Defined Contribution Consulting Program and occasionally receives additional administrative fees from third party program sponsors.

As a broker dealer SII effects securities transactions for compensation for clients. Commissions may be charged in addition to investment advisory services fees. SII and its investment adviser representatives ("IARs") may also receive brokerage commissions from the transactions they recommend to clients. Clients are not required to execute transactions through SII and its IARs. SII and its IARs do not suggest brokers to clients, therefore if a client asks an SII IAR to execute a transaction, the transaction will be executed through SII as a broker-dealer and a commission may be paid to the IAR/Registered Representative of SII. For additional information regarding SII's brokerage practices, please see Item 12. Brokerage Practices.

SII will solicit investment advisory services provided by other registered investment advisers. SII will receive compensation through the solicitation arrangements it has in place with the investment advisers.

SII is affiliated with a life insurance company and an investment company that sponsors various proprietary products such as variable life insurance, variable annuities and mutual funds. As a broker dealer SII sells these products to clients and receives compensation when a client makes a purchase.

Managed Account Programs

Portfolio by Design

SII charges an annual service fee (the "program fee") equal to a percentage of the assets invested in the client's account. The program fee includes the sponsor fee, the service fee as well as the advisory fee. The sponsor fee is the compensation paid to SII for services provided to the client's account and is not negotiable. The service fee is the compensation paid to Envestnet Portfolio Solutions for services provided to the client's account and is not negotiable. The advisory fee is the compensation that is paid to the SII IAR, which is negotiable. SII or Envestnet Portfolio Solutions may, in their sole discretion, pay all or a portion of their portion of the program fee to another party involved in providing services to the client's account. The program fee is based on the investment option(s) being used to manage the client's account.

Within the Premier Manager there are 4 programs: Mutual Fund Wrap Program, Income Portfolios, Active Passive Portfolios and Unified Managed Account Portfolios ("UMA"). Within the Mutual Fund Wrap Program, Income Portfolios and Active Passive Portfolios programs, a maximum program fee of 2.00% may be charged. For assets invested in the UMA the maximum fee is 2.5%. Premier Manager accounts are subject to a \$125.00 minimum quarterly fee.

Within the Premier Advisor there are 2 programs: Mutual Fund Wrap Program and Separately Managed Account Program. For assets invested in the Mutual Fund Wrap Program, a maximum program fee of 2.00% may be charged. For assets invested in the Separately Managed Account Program, the maximum program fee is 3.00% for equity and balanced strategies and 2.50% for fixed income strategies.

Program fees are generally billed quarterly, in advance, based on the average daily balance of the account during the prior quarter. Program fees are debited from the account at the start of each quarter. All unused, pre-paid program fees will be credited (refunded) to the client's account in the event of termination of the investment advisory agreement and/or account closing. The client account will only be charged for the actual days the account was managed. The client may terminate the investment advisory agreement for any reason. If the client wishes to terminate the agreement, he/she must deliver written notice to SII or Envestnet Portfolio Solutions.

Upon establishment of the account, the program fee will be charged the month following the date the account was established. The program fee will be pro-rated for the number of days during the first month the account was managed plus the remainder of days in the current quarter. The program does not charge set-up fees.

Additional fees may be assessed on certain securities transactions. In addition to fees charged by SII and Envestnet Portfolio Solutions, clients may be subject to fees charged by the mutual funds and ETFs in their portfolio. All investments in mutual funds are subject to the terms of each of the applicable prospectuses, including associated fees and underlying mutual fund expenses as fully described in the prospectus. 12b-1 fees are paid on certain offered mutual funds. 12b-1 fee payments are passed through to the accounts.

The program fee includes fees for investment management, clearing and custody. When the Separate Account manager is an affiliated Investment Manager, the portion of the program fee for portfolio management is paid to the affiliated Investment Manager and not to SII.

John Hancock Portfolio Solutions

SII charges an annual account and service fee (the "Program Fee") equal to a percentage of the assets invested in the clients account. The Program Fee includes the "Sponsor Fee" and the "Advisor Fee". The Sponsor Fee is the compensation paid to SII for services provided to the client's account and is not negotiable. The Advisor Fee is the compensation that is paid to the IAR and is negotiable. The Program Fee is based on the investment option(s) being used to advise and administer the client's account. SII may, in its sole discretion, pay all or a portion of the Sponsor Fee to another party involved in providing services to the JHPS Program. The Program Fee may be discounted down to the Sponsor Fee. If the IAR is an employee of SII, SII will retain the advisor fee and the employee will receive compensation.

Manulife Asset Management ("MAM"), the model provider for the JHPS program, is an affiliate of Signator Investors, Inc. Any portion of the program fee paid to the model provider is paid to the affiliated model provider and not to SII. John Hancock Investment Management, LLC, the research provider, is an affiliate of SII. Any portion of the program fee paid to the research provider is paid to the affiliated research provider and not to SII. Additionally, Clients' accounts may be invested in certain affiliated mutual funds under the JHPS program. There are no 12b-1 fees associated with the mutual funds under the JHPS program and there is no explicit incentive for an SII IAR to recommend John Hancock Portfolio Solutions program over another program.

The maximum fee allowable for those assets invested under the JHPS Program is 2.40%. There are no 12b-1 fees associated with the mutual funds under the JHPS, but other underlying mutual fund fees will apply.

Program Fees are billed in advance based on the account value on the last business day of the previous calendar quarter. Program Fees are debited from the account at the start of each quarter. All unused, pre-paid program fees will be credited (refunded) to the client's account in the event of termination of the investment advisory agreement and/or account closing. The client account will only be charged for the actual days the account was managed.

Upon the establishment of an account, the initial fee is calculated and debited on the day after initial assets are placed in the program, for the first quarter or appropriate part thereof. If an account is opened during the last month of the calendar quarter, the fees assessed will include fees for the remaining days in the quarter plus fees for the next calendar quarter. The program does not charge set-up fees. Additional one-time investments of \$10,000 or more will cause the fee to be recalculated and pro-rated as of the day of the additional investment and will be billed in advance based on fair market value calculated on the last business day of the previous calendar quarter.

All investments in mutual funds are subject to the terms of each of the applicable prospectuses, including associated fees and underlying mutual fund expenses. Clients will be advised that fees associated with the JHPS are in addition to fees charged by the mutual funds in their portfolio.

The third party adviser referring clients to SII for access to JHPS receives a referral fee from SII. The referral fee will be paid to the third party adviser's investment adviser representative and follows the same Advisor Fee structure described above.

Signator Managed Account Platform

SII charges an annual program fee (the "Program Fee") equal to a percentage of the assets invested in the clients account. The Program Fee may include the "Sponsor Fee" and "Manager Fee", as well as the "Advisory Fee" depending on the portfolio. The Sponsor Fee is the compensation paid to SII and Envestnet for services provided to the client's account and is not negotiable. The Advisory Fee is the compensation that is paid to the IAR and is negotiable. The Program Fee includes fees for clearing and custody if applicable in a wrap fee account.

SII and Envestnet Asset Management each retain a portion of the Program Fee as compensation for services provided to the client's account. SII may, in their sole discretion, pay all or a portion of the Program Fee to another party involved in providing services to the client's account.

A maximum program fee of 2.00% may be charged. The Client account may be structured as either a wrap fee Program account or a non-wrap fee Program account. A wrap fee Program account is charged an advisory fee as a percentage of assets under management that for one fee includes the management fee, administrative costs of SII and transaction fees for the securities sold and purchased in the account. The non-wrap fee version of the Program is charged a lower advisory fee as well as transaction charges associated with the purchase and sale of each security. There are minimum annual program fees and custodial fees depending on the program and strategist selected by the client.

Program Fees are generally billed quarterly, in advance, based on the average daily balance of the account during the prior quarter. Program Fees are debited from the account at the start of each quarter. All unused, pre-paid program fees will be credited (refunded) to the Client's account in the event of termination of the Agreement and/or account closing. The Client account will only be charged for the actual days the account was managed. Program Fees are automatically deducted from the assets in the client's program unless other arrangements have been made.

Upon establishment of the account, the Program Fee will be charged in the month following the account opening. This Program Fee will be pro-rated for the number of days during the first month the account was managed plus the remainder of days in the current quarter. The Client account will only be charged for the actual days the account was managed.

Additional nominal regulatory fees may be assessed on certain securities transactions.

All investments in mutual funds are subject to the terms of each of the applicable prospectuses, including associated fees and underlying mutual fund expenses as fully described in the prospectus. All clients will be advised that SII's fees are in addition to fees charged by the mutual funds and exchange-traded funds ("ETFs") in their portfolio. 12b-1 fees are paid on certain offered mutual funds. 12b-1 fee payments are passed through to the accounts.

See Appendix 3 Signator Managed Account Platform Wrap Fee Program Brochure for more information on the program.

SEI Asset Management

As a participant in the SEI Goal Link, Private Client Models and Institutional Models, the client will pay an advisory fee to SII and the IAR. The advisory fee is the compensation that is paid to SII and the IAR for services provided to the account.

Clients in the SEI Managed Account Program will pay a program fee which consists of an advisory fee and a management fee. The advisory fee is the compensation paid to SII and the IAR for services provided to the account. SII's portion of the advisory fee is not negotiable. The IAR portion of the advisory fee is negotiable. The management fee is compensation paid to SEI for services provided to the account. SII or SEI may, in their sole discretion, pay all or a portion of the fees received to another party involved in providing services to the client's account.

Fees are charged quarterly, in arrears and are deducted directly from the account. The program and advisory fees are based on percentage of the market value of the assets in the client account.

The client may also incur certain charges imposed by SEI, in connection with investments made through a program account. These charges include:

- SEI Custodial fee
- SEI Fund management fees and administrative servicing fees
- SEI Account Maintenance Fees
- Other fees charged by SEI and IRA and Qualified Retirement Plan fees

SII does not determine, administer or retain any portion of the additional SEI fees listed above. Further information regarding charges and fees assessed by an SEI Fund are available in the appropriate prospectus. A list of charges that may be imposed by SEI are described in the SEI Client Agreement.

A maximum allowable program fee of 2.00% may be charged for those assets in the SEI Mutual Fund Models Program. For assets in the SEI Managed Account Program, the maximum allowable program fee is 3.35%.

Clients may be subject to fees charged by the mutual funds in their portfolio, which are in addition to the program fees discussed above. All investments in mutual funds are subject to the terms of each of the applicable prospectuses, including associated fees and underlying mutual fund expenses as fully described in the prospectus. Please see SEI's ADV Part 2A for more information.

Solicitation Arrangements

Brinker Capital

Clients in the Brinker Capital programs pay a program fee and a solicitor's fee. The program fee is charged by Brinker Capital for services provided to the account. The solicitor's fee is the compensation that is paid to SII and the IAR. SII's portion of the solicitor's fee is not negotiable. The IAR's portion of the solicitor's fee is negotiable. The program fee and solicitor's fee is equal to a percentage of the net asset value of the client's account. Fees are generally billed quarterly, in advance, based on the average daily balance of the account during the prior quarter and are debited from the account at the start of each quarter. The program fee does not cover any fees charged by the Securities and Exchange Commission ("SEC") or U.S. or foreign stock exchanges based on the sale of a security, wire transfer fees, costs associated with temporary investment of client funds in a money market account, transfers of assets upon termination of the account or any internal management or operating fees or expenses imposed or incurred by a mutual fund, ETF or other pooled investment vehicle in which the client's account may be invested or any special requests by the client.

The program fee for accounts over \$100,000 for the Brinker Destinations Program is 0.25%. For accounts under \$100,000, the maximum program fee for the Brinker Destinations program is 0.75%. The mutual funds available in the Destinations program may incur management fees and other operating fees and expenses, which are in addition to the program fee paid to Brinker Capital by the client. For accounts with net asset values of less than \$100,000, Brinker Capital charges an additional annual fee of \$200 payable in four equal installments with the quarterly fee based on the net asset value of the account.

The program fee charged to clients in the Core Asset Manager program is a blended fee based upon asset allocation, portfolio manager selection and total account value. Fees may be discounted or negotiated at Brinker Capital's discretion. For assets in the Brinker Core Asset Manager program, the maximum program fee is 1.40% for equity and balanced portfolios and 0.88% for fixed income portfolios. Brinker Capital's fee does not include the management fee paid to portfolio managers for assets invested in privately placed hedge funds, real estate investment trusts or other pooled investment vehicles, publicly traded mutual funds or exchange traded funds or index-linked debt securities. Such alternative investments may also incur operating fees and expenses. These fees are disclosed in the prospectus or offering documents of the investments. Brinker Capital's fee is calculated quarterly based on the market value of a client's assets and is either paid through redemption of mutual fund

shares or deducted from the client's separately managed accounts, based on the weighted average of the managed account market values.

Clients who participate in the Personal Portfolios program pay a program fee, which covers the investment advisory services provided by Brinker Capital and the portfolio manager(s), all custodial services and brokerage commissions, and the portfolio implementation and coordination services provided by the coordinating sub-adviser. Brinker Capital's program fee for the Personal Portfolios program is based upon the investment strategy selected by the client (which reflects the allocation between equities and fixed income assets) and the size of client's account. The program fees range from 0.45% to 1.05% for the conservative capital preservation model and from 0.85% to 1.15% for moderately aggressive to aggressive models. The program fee is not negotiable. However, in certain circumstances, accounts with assets in excess of \$5 million, fees may be discounted. For accounts using the tax transition features, the fee ranges from 0.90% to 1.05% for the growth and income models and from 0.90% to 1.00% for an all equity growth model.

Clients who participate in the Crystal Strategies program pay a program fee and each component of Brinker's services is priced based upon the size of the account, investment vehicles and portfolio manager(s) (if any) selected. The resulting annual all inclusive fee calculated on account value consists of the following: Brinker's fee for managing the account, including the selection, purchase and sale of investment vehicles, selection of portfolio managers and implementation of investment strategies. Brinker receives an annual fee of equal to a percentage of account value: 0.60% for Crystal Strategy I and 0.50% for Crystal Diversified Income. The base brokerage, clearing and custody charges are a percentage of account value and tiered based upon account size. Fees for Crystal Strategy I start at 0.23% for the first \$250,000 and decline to 0.05% for assets in excess of \$5 million, with a minimum annual charge of \$350. Fees for Crystal Diversified Income start at 0.15% for the first \$250,000 and decline to 0.05% for assets in excess of \$5 million, with a minimum annual charge of \$200. For equity and balanced accounts, the average annual fee is 0.50% of the portion of the account allocated to a separate portfolio manager. Actual fees may range from 0.40% to 1.00% of account value, depending on the portfolio manager selected and the size of the account. For fixed income accounts, the average annual fee is 0.35% of account value. Actual fees may be higher or lower (depending on the portfolio manager selected and the size of the account) and are passed through to the client. This fee is only charged if, and to the extent, any portion of the client's account is allocated to a portfolio manager. There is no separate investment management fee component for the portion of the assets (if any) invested in mutual funds, ETFs and other pooled investment vehicles.

Clients who participate in the Personal Benchmark Program pay a program fee, which covers all investment advisory services provided by Brinker Capital, all custodial services and brokerage commissions, and the portfolio implementation and coordination services provided by the coordinating sub-adviser and style managers. Brinker Capital's fee is 0.70% for accounts under \$500,000, 0.65% for accounts between \$500,000 and \$750,000, 0.60% for accounts between \$750,000 and \$1 million, and 0.55% for accounts \$1 million or more.

Client fees for the Retirement Services Program are paid in arrears based on the plan's account value as of the last business day of the quarter. Brinker's maximum annual fee is 1.25% and does not include any fees charged by Administrator.

Brinker Capital may recommend the use of managed separate accounts, registered mutual funds or ETFs depending on their suitability and the overall benefits each may provide to the particular allocation. Mutual funds and ETFs incur management fees and other operating fees and expenses as disclosed in the prospectuses for such funds. These fees and expenses are in addition to Brinker Capital's program fee.

The fee schedule may be changed by Brinker Capital provided they inform the client of the changes 30 days prior to the change of the fee schedule. The above Brinker Capital program fees do not include the solicitor's fee,

which is negotiable and is equal to a percentage of the net asset value of clients account. The solicitor's fee is determined by the soliciting SII IAR and fall generally within a range of 0.20% to 2.00%.

Fees are payable on the opening of the account (with the exception of Retirement Plan Services), based on the market value of the client's account assets when the account is opened and prorated for the number of days remaining in the calendar quarter. From then on, the quarterly fee is paid in advance, based on the market value of the account as of the last business day of the previous calendar quarter, and is due the following business day. A pro-rata portion of any prepaid fees will be returned on termination of the client's Investment Advisory Agreement. The final fee amount will be based on the account value at the time the account is closed. The client will be entitled to a prorated refund of any pre-paid quarterly fee based upon the number of days remaining in the quarter after the termination date.

Signature Investment Advisors, LLC

Clients in Signature Investment Advisors, LLC ("SIA") investment advisory services programs will pay a program fee and a solicitor's fee. The program fee is charged by SIA for services provided to the account and ranges for 0.10% to 0.43%. The minimum annual program fee is \$3,500. SII, in connection with the performance of its respective services, will receive a share of the program fees as an administrative fee. The maximum annual fee is 1.50%.

The solicitor's fee is the compensation that is paid to the SII IAR and is negotiable. Fees are generally billed quarterly, in arrears, based on the market value of the account on the last day of the quarter and are debited from the client account. SIA may, in their sole discretion, pay all or a portion of the service fee to another party involved in providing services to the client's account.

In addition to the program fees, clients will also be subject to client trading costs. Clients in the Signature Allocation Series may select asset based pricing or transaction based pricing for calculating trading costs. For clients that elect the asset based pricing structure, an annual rate of 0.12%, charged pro-rata daily. For clients in Signature Elite, the client trading costs will be calculated using transaction based pricing. For clients that elect the transaction based pricing structure, equity trades are \$19.95 for the first 1,000 shares. For each share over 1,000, the client is charged \$.015. If the client is enrolled for eDelivery or the total household account value is over \$1,000,000 the fee is \$8.95 per trade. For mutual fund trades of less than \$15,000, the fee is 0.30% of the principal, with a minimum fee of \$22 and a maximum of \$45. For mutual fund trades greater than \$15,000, the fee is 0.15% of the principal, with a minimum of \$45 and a maximum of \$49.95. Prime Broker Trades are \$20 per trade for both the asset and transaction based pricing structure.

Curian Capital, LLC

Clients in the Curian Capital, LLC's ("Curian") Program will pay an all-inclusive fee ("total program fee") that consists of two parts, a program fee and the financial professional fee ("solicitor's fee"). The Curian fees are for certain program services, the Model Manager's services in managing their respective Model Manager Portfolios, and clearing costs associated with securities transaction execution, clearing and custody services on Program Account assets, except with respect to direct trades, and assets held in non-Program cash management account options. See below for tables that show Curian's standard fee structure for the Custom and Select Portfolios.

Custom Portfolios:

Tier	From	Up To	Moderate to Maximum Growth ¹	Conservative to Moderate Conservative ²	Very Conservative
First \$99,000	-	\$99,999	1.25%	1.15%	0.70%
Next \$150,000	\$100,000	\$249,999	1.15%	1.05%	0.70%
Next \$250,000	\$250,000	\$499,999	1.05%	0.95%	0.55%
Next \$500,000	\$500,000	\$999,999	0.95%	0.90%	0.50%
Next \$1 Million	\$1,000,000	\$1,999,999	0.84%	0.79%	0.36%
Next \$3 Million	\$2,000,000	\$4,999,999	0.74%	0.69%	0.33%
Above \$5 Million	\$5,000,000	-	0.64%	0.59%	0.30%

Select Portfolios:

Tier	Advisory Fee	Clearing and Custody	Total Curian Fees
All Asset Levels	0.25%	0.40%	0.65%

Curian may charge additional fees for other services associated with the Client's account. There may be other expenses associated with certain accounts in Curian's program. Please see Curian Capital's Wrap Fee Program Brochure for more specific information regarding the fees and expenses associated with Curian's programs.

The solicitor's fee is the portion paid to SII and SII's IAR. SII's portion of the solicitor's fee is not negotiable. The SII IAR's portion of the solicitor's fee is negotiable and will not exceed 1.50% on an annual basis.

The total program fee is assessed monthly in arrears and is based on the average daily market value of the assets in the Client's account. This fee is due on the first day of the month following establishment of the Client's account and will be deducted from the Client's account after it becomes due. The day fees are deducted may vary to accommodate trading activity that may be occurring. If the client's account is closed during a month the total program fee will be adjusted on a pro rata basis to reflect only those days in which the Client's account was invested

The Pacific Financial Group, INC.

Clients in the Retirement Plan Management Program are invested in managed portfolios made up of the Pacific Financial Group, INC's proprietary mutual funds. All management fees are deducted from the mutual funds and up to 1.00% is paid monthly to the solicitor.

¹ Applies to Tactical Advantage, Dynamic Risk Advantage, Alternative Select, and Enhanced Real Return Strategies as well as Research Select Strategies except (a) Maximize Income and (b) Maximize Income with Risk Control or Risk and Inflation Control.

² Applies to the following: Research Select Strategies: (a) Maximize Income and (b) Maximize Income with Risk Control or Risk and Inflation Control.

Other Programs

Financial Planning

If there is compensation to SII for rendering the financial plan, clients will be charged a fee based on the complexity of the plan and the client's financial objectives and needs. The exact fees to be charged for the financial plan will be specifically listed, by the IAR, in the advisory agreement, which is presented to the client for his or her signature before the planning process begins. A maximum deposit of \$500.00 may be taken no more than six months in advance, with the balance due upon presentation of the plan.

The client may terminate the advisory agreement by written notice within five (5) business days following the date of the contract and receive a full refund of all amounts deposited. However, the client will be responsible for financial planning performed prior to termination, and the balance of the client's deposit, if any, will be properly refunded to the client.

Consultative Services

For consultative services, clients will be charged a fee based on the complexity of the plan or services being provided. Fees may be charged hourly or the IAR may elect to charge a flat fee. Clients may be charged up to \$200 per hour, or by a flat fee. A maximum deposit of \$500.00 may be taken no more than six months in advance, with the balance due upon presentation of the written recommendation.

Defined Contribution Consulting

SII charges an annual fee ("Fee") for Services calculated as either (i) a percentage of the market value of includable Plan assets, (ii) a flat dollar amount (iii) an hourly rate, or (iv) a flat dollar fee with an automatic annual increase, as mutually agreed among the Plan and SII. Fees are negotiable.

Fees are billed quarterly in advance, pro rata for any partial quarter, and any unearned fee following the early termination of the advisory agreement shall be returned by SII on a pro-rated basis. The Plan may elect to have the Fees billed directly to the Plan sponsor, or deducted from Plan assets by the custodian/record keeper and remitted directly to SII.

SII will offset any other compensation it receives directly or indirectly for Services provided to a Plan.

In addition to the Fee charged by SII, Plans may also incur certain charges imposed by unaffiliated third parties. Such charges may include, but are not limited to, fees charged by other investment managers, custodial fees, brokerage commissions, transaction fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund purchased for the Plan which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), fees imposed by variable annuity providers and disclosed in the annuity contract, certain deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

The client may terminate the advisory agreement by written notice within five (5) business days following the date of the contract and receive a full refund of all amounts deposited.

Item 6. Performance-Based Fees and Side-by-Side Management

SII and its IARs do not charge performance-based fees for any of our investment advisory services. The fees are charged on the basis of a percentage of assets under management. Fees related to financial planning and

consultative services are based on the complexity of the plan, time needed to complete the plan and the client's financial objectives and needs. Please refer to Section 5 Fees and Compensation for more information.

SII IARs are also Registered Representatives of SII, a registered broker dealer. SII advisory clients may also have brokerage accounts with an SII Registered Representative who recommends and executes securities trades on the client's behalf. Trades executed in the brokerage accounts may conflict with the trades recommended for the advisory accounts.

Item 7. Types of Clients

Signator Investors, Inc. ("SII") offers investment advisory services to individuals, pensions and profit sharing plans, trusts, estates, non-profit organizations, corporations, partnerships and other types of business entities.

Requirements for Opening & Maintaining an Account

To open an account, clients must complete an investor profile questionnaire. The questionnaire assists the IARs and/or the third-party asset management firms in determining the investment allocation for the portfolio. Additionally, clients must meet the minimum investment amount for the specific managed account program they select. Below please find a table which lists the account minimums for the programs offered through SII.

Exceptions to the account minimums listed below may be made at the discretion of SII.

Program Name	Product Name	Account Minimum
John Hancock Portfolio Solutions	<ul style="list-style-type: none"> Portfolio Solutions 	\$50,000
AdvisorSignator Managed Account Platform	Advisor Managed Portfolios	\$50,000
	Strategist Managed Portfolios	\$25,000 Model minimums are determined by the Model Providers
Portfolio by Design	Portfolio by Design Premier Advisor <ul style="list-style-type: none"> Separately Managed Account Program 	SMA Program: Minimums are determined by the individual Investment Managers
	Portfolio by Design Premier Manager <ul style="list-style-type: none"> Income Portfolios Mutual Fund Wrap Program 	Income Portfolios: \$100,000 Mutual Fund Wrap Program: \$25,000
	Unified Managed Account Portfolios	\$250,000
	ActivePassive Portfolios ®	\$100,000

Program Name	Product Name	Account Minimum
SEI	SEI Private Client Models - Mutual Fund Wrap Accounts	\$50,000
	SEI Institutional Models – Mutual Fund Wrap Accounts	\$50,000
	Goal Link – Mutual Fund Wrap Accounts	\$25,000
	SEI Managed Accounts Program (MAP)	MAP: Minimums are determined by the individual Investment Managers

SII acts as a solicitor on behalf of Brinker Capital, Curian Capital, LLC, Signature Investment Advisors (“SIA”) and the Pacific Financial Group, INC.. Exceptions to the account minimums listed below may be made at the discretion of Brinker Capital, Curian Capital, LLC and SIA.

Brinker Capital	Brinker Destinations – Mutual Fund Wrap Account Program	\$50,000
	Brinker Core Asset Manager – Separately Managed Account Program	\$1,000,000
	Brinker Personal Portfolios – Unified Managed Account Program	\$250,000
	Brinker Crystal Strategies– Unified Managed Account Program	\$100,000
	Brinker Personal Benchmark – Unified Managed Account Program	\$250,000
	Brinker Retirement Plan Services	At Brinker’s Discretion
Signature Investment Advisors, LLC	Signature Allocation Series	Account Minimum: \$50,000 Household Minimum: \$250,000
	Signature Elite	Account Minimum: \$20,000 Household Minimum: \$500,000
Curian Capital, LLC	Curian Custom Style Program	\$25,000
The Pacific Financial Group, INC	Retirement Plan Management	No minimum

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

Methods of Analysis and Investment Strategies

Below please find descriptions of the methods of analysis for investment advice that is furnished by SII investment adviser representatives (“IARs”). SII IARs may rely on research services of various money managers, corporate press releases and annual reports, SEC filings, corporate rating services, prospectuses and financial industry periodicals when making recommendations.

For additional specific information regarding the methods of analysis or investment strategies used by the third-party asset management firms mentioned below, please see the Form ADV Part 2A of the respective third party asset management firms.

Managed Account Programs

Portfolio by Design

In the Premier Manager, UMA, Active Passive and Income Portfolios programs, the client provides the IAR with information regarding investment objectives, investment time horizon, risk tolerance and other relevant information. The IAR then inputs this information into Envestnet Portfolio Solutions' proprietary investment allocation system, which in turn provides the client and the IAR with a number of investment options that have been determined to be appropriate choices for the client. To make this determination, Envestnet Portfolio Solutions, evaluates available investments based on their proprietary criteria.

In the Premier Advisor program, the client provides the IAR with information regarding investment objectives, financial status, investment time horizon, risk tolerance and other relevant information. The IAR then inputs this information into a proprietary Envestnet Portfolio Solutions investment allocation system, which in turn provides the client and the IAR a number of proposed investment options which can be adjusted based on the IAR's recommendations and the client's acceptance of those recommendations.

Please see Envestnet Portfolio Solutions' Form ADV Part 2A for more information about Envestnet Portfolio Solutions' specific methods of analysis and investment strategies.

John Hancock Portfolio Solutions

After the investor profile questionnaire is completed, SII's IAR utilizes technology to analyze the client information and recommend an appropriate strategy based on the client's needs and objectives, investment time horizon, risk tolerance and other pertinent factors. SII will then propose an overall strategy that includes asset allocation and investment style recommendations.

The investment adviser representatives of the soliciting third party adviser are responsible for assisting the client like SII IAR's do for the JHPS program.

SII manages the JHPS program which offer individual clients actively managed portfolios comprised of mutual funds and ETFs. SII is granted investment discretion. Manulife Asset Management provides SII with recommended model investment portfolios based on specific investment strategies and may, from time to time, recommend changes to asset class allocations and specific mutual fund and ETF selections. John Hancock Investment Management, LLC provides research related to the mutual funds and ETFs SII includes in the model portfolios. SII's Investment Committee uses a number of analytical tools and software applications in determining whether to follow those recommendations. Some of the factors considered are historical rates of risk and return for various asset classes, correlation across asset classes and risk premiums. SII will solely determine whether to follow those recommendations. SII will also periodically rebalance and reallocate the portfolios. Once a rebalance or reallocation is determined it will occur at the then current quarter end.

Signator Managed Account Platform

In the Strategist Managed Portfolios Program, the client provides the IAR with information regarding investment objectives, investment time horizon, risk tolerance and other relevant information. The IAR then inputs this information into Envestnet Asset Management's proprietary investment allocation system, which in turn provides the client and the IAR with a number of investment model portfolios that have been determined to be appropriate choices for the client.

In the Advisor Managed Portfolios Program, the client provides the IAR with information regarding investment objectives, financial needs, investment time horizon, risk tolerance and other relevant information. The IAR inputs this information into the Envestnet platform to build a model portfolio for the client, recommend an

appropriate asset allocation among the investment options in the Program and select appropriate investment vehicles for the Client's account coinciding with the Client's risk tolerance parameters.

SEI Asset Management Program

For the SEI Private Mutual Fund Models Program, the IAR will assist the client in selecting a specific asset allocation portfolio appropriate for the client by discussing the various levels of risk and by helping the client complete a questionnaire. The questionnaire helps the IAR learn specific information about the client including but not limited to the client's annual income, net worth, long-term goals and investment objectives. This information is furnished to SEI who constructs and maintains asset allocation portfolios comprised of SEI mutual funds.

For the SEI Managed Account Program, the IAR will assist the client in completing a questionnaire that will identify specific information about the client's financial situation. The information including but not limited to the client's annual income net worth, long-term goals and investment objectives is provided to SEI. SEI then recommends one or more sub-advisers to manage individual portfolios of stocks and bonds based on a specific investment style. The SII IAR with the client then chooses the sub-adviser(s) from the SEI recommendations.

Please see SEI's Form ADV Part 2A for more information about SEI's specific methods of analysis and investment strategies.

Solicitation Arrangements

Brinker Capital

For the programs offered by Brinker Capital, the client provides SII with information about investment objectives, financial needs, investment time horizon, risk tolerance and other relevant information. SII then furnishes the information to Brinker through Brinker's proprietary proposal system or by contacting Brinker directly. Brinker will then propose an overall strategy that includes asset allocation and investment style recommendations.

Please see Brinker Capital's Form ADV Part 2A for more information about Brinker Capital's specific methods of analysis and investment strategies.

Signature Investment Advisors, LLC

For the programs offered through Signature Investment Advisors, LLC ("SIA"), the IAR will assist the client in completing a client profile form in addition to a risk tolerance questionnaire provided by SIA. The IAR then furnishes this information to SIA who will then propose an overall strategy that includes asset allocation and investment style recommendations.

Please see Signature Investment Advisors, LLC's Form ADV Part 2A for more information about Signature Investment Advisors, LLC's specific methods of analysis and investment strategies.

Curian Capital, LLC

For the programs offered by Curian Capital, LLC ("Curian"), the client provides SII with information about investment objectives, financial needs, investment time horizon, risk tolerance and other relevant information. SII then furnishes the information to Curian through Curian's proprietary proposal system. Curian will then propose an overall strategy that includes asset allocation and investment style recommendations.

Please see Curian Capital, LLC's Wrap Fee Program Brochure for more information about Curian Capital's specific methods of analysis and investment strategies.

The Pacific Financial Group, INC

For the program offered by the Pacific Financial Group, INC, the client provides SII with information about investment objectives, financial needs, investment time horizon, risk tolerance and other relevant information. SII then furnishes the information to the Pacific Financial Group, INC who will then propose an overall strategy that includes asset allocation and investment style recommendations.

Please see the Pacific Financial Group, INC's Form ADV Part 2A for more information about the Pacific Financial Group, INC's specific methods of analysis and investment strategies.

Other Programs

Financial Planning and Consultative Services

Pursuant to a written and executed advisory agreement, the IARs of SII will consult with the client to obtain information regarding the client's financial situation. The client is responsible for the accuracy and completeness of the information. With this information, the IAR will utilize third party software that has been approved by SII's Corporate Registered Investment Adviser Committee to create an appropriate financial plan or written consultative services recommendation, based upon the facts obtained by the IAR.

Subsequent to the information gathering period, SII, through its IARs, will deliver a written financial plan or written consultative services recommendation to the client and shall arrange to meet with the client to review the document. This plan or recommendation will be the product of a specific computer-generated program that is offered by an approved third party financial planning software vendor. The program draws on statistical samples and is designed to provide general guidance towards accomplishing stated goals. The third party software vendors who supply the programs are unaffiliated with SII.

Financial plans or written consultative services recommendations provided by SII will only offer generic recommendations and do not make recommendations for specifically named investment, advisory or insurance products. Any recommendations developed by an IAR are based upon the IAR's professional judgment and neither SII nor its IAR can guarantee the results of these recommendations. The clients may obtain legal, accounting and other investment services from any professional source to implement any recommendations made by SII IARs. SII does not provide legal or accounting services.

Based on the plan or written recommendation presented, the client may implement solutions with non-advisory products leveraging the SII representative's capacity as broker-dealer representative or insurance agent. Clients will not be obligated to use SII as their broker-dealer to purchase securities or John Hancock Life Insurance Company (U.S.A) or John Hancock Life Insurance Company of New York as agency of record to purchase insurance. Clients are made aware, in writing, that the IAR is also a registered representative of SII and insurance agent of John Hancock Life Insurance Company (U.S.A.) or John Hancock Life Insurance Company of New York. The client is informed that the registered representative may give more specific recommendations regarding investments in his or her separate role as a registered representative of SII. The client is informed that the insurance agent may give more specific recommendations regarding investments in his or her separate role as an insurance agent. Clients will not be obligated to use SII to purchase specific advisory products. If the client chooses to purchase advisory products, a separate investment advisory agreement with the client will be executed.

After the plan or recommendation is delivered, any updates to the plan or written recommendation, or execution of the recommendations made in the plan or written recommendation is at the sole discretion of the client. The client is not obligated to implement any part of the plan or written recommendation. SII and its IAR are not obligated to update the plan.

Defined Contribution Consulting

SII delivers fiduciary services in its capacity as an ERISA fiduciary. This means in part that the overriding objective of its non-discretionary advice is to act exclusively for the benefit of participants and their beneficiaries in order to provide retirement income, and to consider only factors relevant to such purpose. Fiduciary services are based on generally accepted investment theories, including concepts such as modern portfolio theory.

SII relies on information provided by the Plan and its service providers without independent verification concerning the demographics of the participants and other information that is applicable to the particular needs of the Plan and the employee workforce. If requested, SII will help the Plan establish a written investment policy that will govern the selection and removal of investment options. Both quantitative factors (performance history, expense ratio, standard deviation, for example) and qualitative factors (management style and continuity, investment style, turnover ratio, for example) are incorporated into the investment policy. If requested, SII will then use the written investment criteria to identify appropriate investment options within the platform selected by the Plan. SII will recommend investment options to the Plan, and monitor them on a periodic basis and report its findings to the Plan.

Risk of Loss

Investments are subject to various market, political, currency, economic, business and other risks, and may not always be profitable. All investment programs carry the risk of loss and there is no guarantee that any investment strategy will meet its objective. Certain strategies, methods of analysis and underlying securities may carry more risk than others. SII does not develop the investment strategies offered by the third-party asset management firms.

The material risks associated with the financial plans are (1) that the generic recommendations are derived from historical data and forward looking assumptions that may not continue in the future or may not completely or accurately capture all the possible scenarios of future financial markets, and (2) asset allocations may not be optimal as market environments continue to evolve.

The projections and simulations are based on a variety of assumptions that may prove, in the future, to be erroneous. The results that clients obtain may vary significantly from the projections. In addition, the results of the simulation may under-compensate or over-compensate for the impact, if any, of certain market factors and may underestimate the impact of market extremes and the related risk of loss.

For additional specific information regarding the risk of loss associated with investment strategies, methods of analysis and underlying securities used by the third-party asset management firms mentioned above please see the Form ADV Part 2A of the respective third party asset management firm.

Item 9. Disciplinary Information

SII does not have any disciplinary information to disclose.

Item 10. Other Financial Industry Activities and Affiliations

Other Financial Activities

Signator Investors, Inc. ("SII") is a registered investment adviser with the SEC. SII is also a broker-dealer registered with FINRA, the SEC and various states. Certain SII home office personnel are registered representatives of the broker-dealer. As a broker-dealer, SII transacts business in mutual funds, stocks, bonds, options, variable and fixed annuities, unit investment trusts, limited partnerships and variable life insurance. SII

has its clearing relationship with National Financial Services, LLC. SII is licensed to operate in all 50 states plus the District of Columbia and Puerto Rico. John Hancock Financial Network, Inc. wholly owns Signator Investors, Inc.

Affiliations

The Portfolio by Design program includes an approved list of Investment Managers as well as strategies managed by Manulife Asset Management (US) LLC (“MAM”). MAM, an affiliate of Signator Investors, Inc., is the model provider to SII for the John Hancock Portfolio Solutions program. PBD, JHPS and Advisor Managed Portfolios Program also offer certain affiliated mutual funds. There is no explicit incentive for an SII IAR to recommend an affiliated model provider, investment manager or affiliated mutual fund over another model provider, investment manager or other offered mutual funds.

There is a small group of SII employees who are SII IARs that offer JHPS to clients and none of the other SII managed account programs. There is no explicit incentive to offer JHPS over other non-advisory products as the compensation paid to these employees is treated the same.

There are a group of SII employees that are dual registered representatives and IARs with Signator Financial Services, Inc. (“SFS”) an affiliated registered broker dealer and investment adviser. These SII employees provide services to SFS. SFS does not pay any direct compensation to the SII employees so there is no explicit incentive for the SII employees to provide services to SFS over SII.

Other Related Parties

Manulife Asset Management (US) LLC
197 Clarendon Street
Boston, MA 02116

John Hancock Investment Management Services, LLC
601 Congress Street, 11th Floor
Boston, MA 02210-2805

Hancock Capital Investment Management, LLC
197 Clarendon Street, C-2-03
Boston, MA 02116

John Hancock Distributors LLC
601 Congress Street
Boston, MA 02110

John Hancock Funds, LLC
601 Congress Street
Boston, MA 02110

Signator Financial Services, Inc.
10500 NE 8th St., Ste 720
Bellevue, WA 98004

Item 11. Code of Ethics and Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

SII is responsible for ensuring compliance with Rule 204A-1 of the Advisers Act, which requires a registered investment adviser to establish, maintain and enforce a written code of ethics. Consistent with this obligation, SII has adopted a Code of Ethics that, at a minimum, seeks to promote compliance with fiduciary standards and the means to address conflicts of interest arising from the personal securities transactions of its employees and its IARs. The Code of Ethics describes the standards of conduct that is expected of its employees and IARs. A copy of SII's Code of Ethics is available to clients upon request.

Among other things, the Code limits and monitors the personal ETF trading activity of certain employees, including certain members of employees' households. These limitations seek to further SII's efforts to prevent employees from personally benefitting from SII's investment decisions for its clients. The Code requires certain employees and certain household members to "pre-clear" their personal ETF transactions with SII's Compliance Department prior to execution.

Item 12. Brokerage Practices

Portfolio by Design

Portfolio by Design accounts are established with National Financial Services, LLC for custody and trade execution services. Certain trades for the Portfolio by Design Advisor accounts are entered by SII's IARs and routed through SII's trade desk for execution at National Financial Services, LLC. The trades executed through SII's trade desk are not aggregated so each client account will receive an individual execution price that may be lower or higher than other clients trading the same security. SII acknowledges that by directing brokerage, clients may not receive best execution on transactions for their accounts. SII does not receive client referrals from any of its directed brokerage arrangements. Sub-Managers of the separately managed accounts will have the authority to effect transactions for SII's accounts with or through another broker, dealer or bank if the Sub-Manager believes that "best execution" of transactions may be obtained through such other broker, dealer or bank, including any broker-dealer that is affiliated with the Advisor or Sub-Manager. Please see Envestnet Portfolio Solutions' Form ADV Part 2A for more information regarding Envestnet Portfolio Solutions' brokerage practices.

John Hancock Portfolio Solutions

Trade execution and custodial services are provided by National Financial Services, LLC pursuant to an agreement between SII, Envestnet and National Financial Services, LLC. SII acknowledges that by directing brokerage, Clients may not receive best execution on transactions for their accounts and the cost of the transactions may be more or less than if executed with another brokerage firm. SII does not receive client referrals from any of its directed brokerage arrangements.

Signator Managed Account Platform

Trade execution and custodial services are provided by National Financial Services, LLC pursuant to an agreement between SII, Envestnet and National Financial Services, LLC. SII acknowledges that by directing brokerage, Clients may not receive best execution on transactions for their accounts and the cost of the transactions may be more or less than if executed with another brokerage firm. SII does not receive client referrals from any of its directed brokerage arrangements. Please see Envestnet Asset Management's Form ADV Part 2A for more information regarding Envestnet Portfolio Solutions' brokerage practices.

SEI

SEI accounts are established with SEI's Private Trust Company for custody and trade execution. Please see SEI's Form ADV Part 2A for more information regarding SEI's brokerage practices.

Brinker Capital

Please see Brinker Capital's Form ADV Part 2A for information regarding Brinker Capital's brokerage practices.

Signature Investment Advisors, LLC

Please see Signature Investment Advisors, LLC's Form ADV Part 2A for information regarding Signature Investment Advisors, LLC's brokerage practices.

Curian Capital, LLC

Please see Curian Capital, LLC's Wrap Fee Program Brochure for information regarding Curian Capital, LLC's brokerage practices.

The Pacific Financial Group, INC

Please see the Pacific Financial Group, INC's Form ADV Part 2A for information regarding the Pacific Financial Group, INC's brokerage practices.

Soft Dollar Arrangements

SII does not engage in soft dollar arrangements with its service providers.

Item 13. Review of Accounts**Review of Managed Client Accounts**

Signator Investors, Inc. ("SII") reviews a sample of its managed client accounts on a quarterly basis. The managed client accounts are reviewed to proactively identify any potential account irregularities.

To conduct its review of accounts, SII selects a sample of accounts and acquires specific account information and documentation that is examined during the review. After the review is completed a report of findings are presented to various members of the SII management team. Findings are reviewed and addressed to make certain that issues are addressed in a timely manner. These reports are not issued to the respective account owners. If SII becomes aware of a matter that requires the client's attention in order to resolve, SII will promptly notify the client.

SII IARs meet at least annually with the clients to determine if there have been any changes to stated needs and objectives, or if there have been any significant changes in their financial situation that would warrant a change to the way their account is invested. Clients are encouraged to contact the IAR when these changes occur.

Clients invested under the SII managed account programs receive monthly or quarterly written custodial statements. Quarterly performance reports are printed and sent from the respective programs.

Review of Financial Plans and Consultative Services

Financial plans and consultative services written recommendations generated by SII Investment Adviser Representatives ("IARs") are reviewed by SII's Regional Supervision Consultants prior to the presentation of the financial plan and consultative services written recommendation to the client. The financial plans and consultative services written recommendations are reviewed to verify that:

- they meet the client's stated needs and objectives
- the plans and recommendations are delivered in a timely manner
- the IAR used SII-approved financial planning software
- the appropriate fee is assessed by the IAR

Review of Defined Contribution Consulting Accounts

SII reviews a sample of its DC Consulting accounts on a quarterly basis. The accounts are reviewed to proactively identify any potential account irregularities.

To conduct its review of accounts SII selects a sample of accounts and reviews fee calculations based on the submission of the plan statements. After the review is complete the Director, DC Product Platform creates and distributes a report of findings to various members of the SII management team. Findings are reviewed and addressed to make certain issues are addressed in a timely manner. These reports are not issued to respective account owners. If SII becomes aware of a matter that requires the client's attention in order to resolve, SII will promptly notify the client.

SII IARs meet at least annually with the clients to determine if there have been any changes to stated needs and objectives, or if there have been any significant changes to their business situation that would warrant a change to they way their account is managed. Clients are encouraged to contact the IAR when these changes occur.

Item 14. Client Referrals and Other Compensation

In addition to the fees described in Item 5, SII may receive additional compensation from third party money managers in connection with the distribution, marketing and administrative support services SII provides. This additional compensation is paid to SII by the third party money manager from its own revenues and is commonly referred to as "revenue sharing". This fee is typically paid to SII quarterly and is based upon new sales or assets under management for the previous quarter.

Clients do not pay more because of these arrangements. Sales and assets in accounts subject to Title I of ERISA are not included in these arrangements due to ERISA restrictions on certain retirement accounts.

The receipt of revenue sharing creates a conflict of interest for SII since SII is incentivized to offer the investment programs of the managers that pay SII through these revenue sharing arrangements. SII receives greater overall fees from firms where SII has these arrangements.

SII currently has revenue sharing arrangements with the following firms:

☐ **Brinker Capital Inc.** For accounts opened on or after January 1st, 2014, in the Destinations, Core, Personal Portfolios Programs and Crystal Portfolios, Brinker pays SII a quarterly fee of 0.0125% of the assets in these programs to assist with marketing and administrative services.

☐ **Curian Capital, LLC.** For accounts opened on or after January 1, 2014, in the Custom Style Portfolio Program and Select Portfolios, Curian Capital pays SII a quarterly fee of up to 0.06% on the new assets in this program, as well as a quarterly fee of 0.03% on all assets in this program to assist with marketing and administrative services.

☐ **National Financial Services, LLC.** For certain advisory programs, National Financial Services LLC. pays SII a fee ranging from 0.03% to 0.12% of aggregate no-transaction fee mutual fund assets held with National Financial Services LLC.

The distribution, marketing and administrative services we provide to these firms refer to programs that include, but are not limited to, the following:

- Access to our Agency Meetings
- Access to our Investment Adviser Representative Lists

- Due Diligence Meetings for our Adviser Representatives hosted by the Money Manger
- Marketing Support (we provide articles, website listings, field communications regarding the advisory programs to our adviser representatives)
- Newsletter participation
- Training and educational support

Additionally, SII's Investment Adviser Representatives ("IARs") may also benefit by receiving reimbursements or marketing allowances for marketing expenses and due diligence trips incurred by the IAR.

For this reason, SII's IARs are incentivized to offer these advisory programs to clients. SII address these conflicts of interest by monitoring the arrangements with these managers, supervising SII IARs' activities, and by disclosing these arrangements to clients.

SII IARs may also receive client referrals from non-registered Certified Public Accountants ("CPA") for advisory services. These CPAs may reside in a state where registration for solicitation is not a requirement. Each client receives a solicitor fee disclosure document that outlines the referral arrangement and any compensation to the individual making the referral.

Please see our "Welcome Brochure" for additional information. Our Welcome Brochure is available on our website at: www.SignatorInvestors.com.

Item 15. Custody

Portfolio by Design Program

Neither SII nor Envestnet Portfolio Solutions will maintain custody of the account holdings owned by each client. Clearing and custody services are performed by National Financial Services, LLC ("NFS"), a Fidelity Investments company. Each client will be the registered owner of his or her shares held by NFS. SII and Envestnet Portfolio Solutions have a type of custody because they may instruct National Financial Services, LLC to directly charge quarterly and pro-rated quarterly fees, as needed, and may deduct funds to cover such fees without separate authorization from the client. Monthly custodial statements are prepared and delivered to the client by NFS. The Portfolio by Design quarterly statements are prepared and delivered to the client by Envestnet Portfolio Solutions. Clients are encouraged to carefully review the information contained in the statements and to promptly report any discrepancies.

John Hancock Portfolio Solutions

SII will not maintain custody of the account holdings owned by each client. Clearing and custody services are performed by National Financial Services, LLC ("NFS"), a Fidelity Investments company. Each client will be the registered owner of his or her shares held by NFS. However, SII is considered legally to have custody since it may instruct NFS to directly charge quarterly and pro-rated quarterly fees, as needed, and may deduct funds to cover such fees without separate authorization from the client. Monthly custodial statements are prepared and delivered to the client by NFS. The John Hancock Portfolio Solutions quarterly statements are prepared and delivered to the client by Envestnet. Clients are encouraged to carefully review the information contained in the statements and to promptly report any discrepancies.

Signator Managed Account Platform

SII will not maintain custody of the account holdings owned by each Client. Clearing and custody services are performed by National Financial Services, LLC ("NFS"), a Fidelity Investments company. Each Client will be the registered owner of his or her shares held by NFS. However, SII is considered legally to have custody since it may instruct NFS to directly charge quarterly and pro-rated quarterly fees, as needed, and may deduct funds to cover such fees without separate authorization from the client. Monthly custodial statements are prepared and delivered to the client by NFS. The Advisor quarterly performance statements are prepared and delivered to the

client by Envestnet. Clients are encouraged to carefully review the information contained in the statements and to promptly report any discrepancies.

SEI Asset Management Program

SII will not maintain custody of the client account holdings. Custody services will be performed by SEI. Each client will be the registered owner of his or her shares held by SEI. SII has a type of custody because SII may instruct SEI to directly charge quarterly and pro-rated quarterly fees, as needed, and may deduct funds to cover such fees without separate authorization from the client. Monthly custodial and quarterly statements are produced and delivered to the clients by SEI Private Trust. Clients are encouraged to carefully review the information contained in the statements and to promptly report any discrepancies.

Brinker Capital

SII acts as a solicitor on behalf of Brinker Capital and does not have an advisory relationship with Brinker Capital.

Please refer to Brinker Capital's Form ADV Part 2A for more information regarding Brinker Capital's current custody arrangements.

Signature Investment Advisors, LLC

SII acts as a solicitor on behalf of Signature Investment Advisors, LLC and does not have an advisory relationship with Signature Investment Advisors, LLC.

Please refer to Signature Investment Advisors, LLC's Form ADV Part 2A for more information regarding Signature Investment Advisors, LLC's current custody arrangements.

Curian Capital, LLC

SII acts as a solicitor on behalf of Curian Capital, LLC and does not have an advisory relationship with Curian Capital, LLC.

Please refer to Curian Capital, LLC's Wrap Fee Program Brochure for more information regarding Curian Capital, LLC's current custody arrangements.

The Pacific Financial Group, LLC

SII acts as a solicitor on behalf of the Pacific Financial Group, INC and does not have an advisory relationship with the Pacific Financial Group, INC.

Please refer to the Pacific Financial Group, INC's, Form ADV Part 2A for more information regarding the Pacific Financial Group, INC's current custody arrangements.

Item 16. Investment Discretion

SII has discretionary authority to manage the accounts in the John Hancock Portfolio Solutions program. Clients may impose limitations on their individual accounts. Clients grant SII discretionary authority upon executing the Statement of Investment Selection and incorporated Terms and Conditions of the John Hancock Portfolio Solutions program.

SII through its IARs may have discretionary authority to manage the accounts in the Advisor Managed Portfolios Program. Clients may impose limitations on their individual accounts. Client grants SII's IAR discretionary

authority upon executing the Statement of Investment Selection and the Terms and Conditions of the Advisor Managed Portfolios Program.

SII is contractually granted limited discretionary authority in some managed programs described in this Form ADV Part 2A. However, SII does not have discretionary management of accounts in the PBD, SEI, Brinker Capital, Signature Investment Advisors, LLC, the Pacific Financial Group, INC and Curian Capital, LLC's programs. A description of the investment discretion granted in these programs is detailed in Item 4. Advisory Business.

Item 17. Voting Client Securities

Signator Investors, Inc. does not vote client proxies. Clients will vote proxies associated with the Advisor Managed Portfolios Program. Each third party asset manager has its own proxy voting policies. Clients should refer to the Form ADV Part 2A of the individual manager or asset allocation program for more information on proxy voting practices. Please see Item 4. Advisory Business for more information on Signator Investors, Inc.'s advisory business relationships.

Item 18. Financial Information

This item is not applicable to SII.