



SEC File Number 801-54949

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**PRINCOR FINANCIAL SERVICES CORPORATION**

**October 2009**

711 High Street  
Des Moines, IA 50392-0200  
888-774-6267

# Principal Advisory Select Portfolios<sup>SM</sup>

This brochure provides clients with information about Princor Financial Services Corporation and the Principal Advisory Select Portfolios program that should be considered before becoming a client of the Advisory Select program. You should consider carefully the information contained in this brochure before retaining Princor Financial Services Corporation to provide any of the services provided. The information in this brochure has not been approved or verified by any governmental authority.

Schedule H to Form ADV

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## PRIVACY NOTICE

This Notice is provided on behalf of the following companies of the Principal Financial Group:

Principal Life Insurance Company  
Principal National Life Insurance Company  
Princor Financial Services Corporation  
Principal Investors Fund, Inc. / Principal Funds Distributor, Inc.  
Principal Life Insurance Company Variable Life Separate Account  
Principal Life Insurance Company Separate Account B  
Principal Global Investors, LLC  
Principal Global Investors Trust  
Principal Real Estate Investors, LLC  
Principal Commercial Acceptance, LLC  
Principal Commercial Funding, LLC  
Principal Green Fund I, LP / PGF GP, LLC  
Principal Enhanced Property Fund, GP LLC  
Principal Enhanced Property Fund, LP  
Principal Trust Company  
Spectrum Asset Management, Inc.  
Columbus Circle Investors / Post Advisory Group, LLC  
Employers Dental Services, Inc. / Principal Dental Services, Inc.  
JF Molloy & Associates, Inc. / Principal Wellness Company

### PROTECTING YOUR PRIVACY

This Notice is required by law. It tells how we handle personal information.

This Notice applies to:

- people who own or apply for our products or services for personal use.
- employee benefit plan participants and beneficiaries.

Please note that in this Notice, “you” refers to only these people. The Notice does not apply to an employer plan sponsor or group policyholder.

### WE PROTECT INFORMATION WE COLLECT ABOUT YOU

We follow strict standards to safeguard personal information. These standards include limiting access to data and regularly testing our security technology.

### HOW WE COLLECT INFORMATION

We collect data about you as we do business with you. Some of the sources of this data are as follows:

- **Information we obtain when you apply or enroll for products or services.** You may provide facts such as your name; address; Social Security number; financial status; and, when applicable, health history.
- **Information we obtain from others.** This may include claim reports, medical records, when applicable, credit reports, property values and similar data.
- **Information we obtain through our transactions and experience with you.** This includes your claims history, payment and investment records, and account values and balances.
- **Information we obtain through the Internet.** This includes data from online forms you complete. It also includes data we collect when you visit our websites.

### HOW WE SHARE INFORMATION

#### Within the Principal Financial Group

We may share personal information about you or about former customers, plan participants or beneficiaries within the Principal Financial Group for several reasons, including:

- to assist us in providing service;
- to help design and improve products; or
- with your consent, at your request or as allowed by law.

#### With Others

In the course of doing business we may share data with others. This could include personal information about you or about former customers, plan participants or beneficiaries. Personal information may be shared with others for the following reasons:

- in response to a subpoena,
- to prevent fraud,
- to comply with inquiries from government agencies or other regulators, or
- for other legal purposes.

We also may share personal information:

- with others that service your accounts, or that perform services on our behalf;
- with others with whom we may have joint marketing agreements. These include financial services companies (such as other insurance companies, banks or mutual fund companies); and
- with other companies with your consent, at your request or as allowed by law.

## MEDICAL INFORMATION

We do not share medical information among companies of the Principal Financial Group or with others except:

- when needed to service your policies, accounts, claims or contracts;
- when laws protecting your privacy permit it; or
- when you consent.

## ACCURACY OF INFORMATION

We strive for accurate records. Please tell us if you receive any incorrect materials from us. We will make the appropriate changes.

## COMPANIES WITHIN THE PRINCIPAL FINANCIAL GROUP

Several companies within the Principal Financial Group are listed at the top of this Notice. The companies of the Principal Financial Group are leading providers of retirement savings, investment, and insurance products.

## MORE INFORMATION

You may write to us if you have questions about our Privacy Notice. Contact our Privacy Officer at P.O. Box 14582, Des Moines, Iowa 50306-3582.

*Receipt of this notice does not mean your application has been accepted.*

*We may change our privacy practices at times. We will give you a revised notice when required by law.*

*Our privacy practices comply with all applicable laws. If a state's privacy laws are more restrictive than those stated in this Notice, we comply with those laws.*

*Your agent, broker, registered representative, consultant or advisor may have a different privacy policy.*

1-800-986-3343



# CALIFORNIA PRIVACY NOTICE

This Notice is provided on behalf of the following companies of the Principal Financial Group:

Principal Life Insurance Company  
Principal National Life Insurance Company  
Princor Financial Services Corporation  
Principal Investors Fund, Inc. / Principal Funds Distributor, Inc.  
Principal Life Insurance Company Variable Life Separate Account  
Principal Life Insurance Company Separate Account B  
Principal Global Investors, LLC  
Principal Global Investors Trust  
Principal Real Estate Investors, LLC  
Principal Commercial Acceptance, LLC  
Principal Commercial Funding, LLC  
Principal Green Fund I, LP / PGF GP, LLC  
Principal Enhanced Property Fund, GP LLC  
Principal Enhanced Property Fund, LP  
Principal Trust Company  
Spectrum Asset Management, Inc.  
Columbus Circle Investors / Post Advisory Group, LLC  
Employers Dental Services, Inc. / Principal Dental Services, Inc.  
JF Molloy & Associates, Inc. / Principal Wellness Company

## PROTECTING YOUR PRIVACY

This Notice is required by law. It tells how we handle personal information.

This Notice applies to individual residents of California who:

- own or apply for our products or services for personal use.
- are employee benefit plan participants and beneficiaries.

Please note that in this Notice, “you” refers to only these people. The Notice does not apply to an employer plan sponsor or group policyholder.

## WE PROTECT INFORMATION WE COLLECT ABOUT YOU

We follow strict standards to protect personal information. These standards include limiting access to data and regularly testing our security technology.

## HOW WE COLLECT INFORMATION

We collect data about you as we do business with you. Some of the sources of this data are as follows:

- **Information we obtain when you apply or enroll for products or services.** You may provide facts such as your name; address; Social Security number; financial status; and, when applicable, health history.
- **Information we obtain from others.** This may include claim reports, medical records, credit reports and similar data.
- **Information we obtain through our transactions and experience with you.** This includes your claims history, payment and investment records, and account values.
- **Information we obtain through the Internet.** This includes data from online forms you complete. It also includes data we receive when you visit our website.

## HOW WE SHARE INFORMATION

We may share personal information about you or about former customers, plan participants or beneficiaries among companies within the Principal Financial Group or with others for several reasons, including:

- to assist us in servicing your account;
- to protect against potential identity theft or unauthorized transactions;
- to comply with inquiries from government agencies or other regulators, or for other legal purposes;
- with your consent, at your request or as allowed by law.

## MEDICAL INFORMATION

We do not share medical information among companies of the Principal Financial Group or with others except:

- when needed to service your policies, accounts, claims or contracts;
- when laws protecting your privacy permit it; or
- when you consent.

## ACCURACY OF INFORMATION

We strive for accurate records. Please tell us if you receive any incorrect materials from us. We will make the appropriate changes.

## COMPANIES WITHIN THE PRINCIPAL FINANCIAL GROUP

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*Receipt of this notice does not mean your application has been accepted.*

*We may change our privacy practices at times. We will give you a revised notice when required by law.*

*Our privacy practices comply with all applicable laws.*

*Your agent, broker, registered representative, consultant or advisor may have a different privacy policy.*

**1-800-986-3343**

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## I. Introduction

Princor Financial Services Corporation (referred to herein as “Princor”) offers a range of investment advisory services to individuals, businesses, trusts and certain pension and profit sharing plans. One service that is described in this brochure is the Principal Advisory Select Portfolios<sup>SM</sup> (referred to herein as “Advisory Select” or the “Advisory Select Program”). The Advisory Select Program is subject to risks associated with investing in securities and the investments in the asset allocation models will not always be profitable. Princor does not guarantee the results of any advice or recommendations, nor does it guarantee that the investment objectives of advisory clients utilizing the Advisory Select Program will be met.

## II. The Advisory Select Program and Services Provided

Advisory Select is an investment advisory program with the objective of assisting individual clients in developing and maintaining a strategic asset allocation strategy that is appropriate to their investment objectives, financial situation, and investment risk tolerance. The Advisory Select Program permits the client to invest in a broad array of Eligible Investments (as defined below) and is a non-discretionary investment advisory program. A client obtains the following services in connection with the Advisory Select Program:

### Investment Questionnaire and Asset Allocation Modeling

An investment adviser representative of Princor (hereafter the “Financial Advisor”) will assist prospective clients in a review of their investment objectives, investing time horizon, financial situation and investment risk tolerance. The Financial Advisor will also assist the prospective client in completing an investment questionnaire. Based on the answers provided in the investment questionnaire, the Financial Advisor will recommend one of a number of asset allocation models. The asset allocation models consist of three core equity and two fixed income asset classes and suggested asset class percentage allocations for each (hereafter, the “Asset Class Mix”) that are prepared and annually updated by Ibbotson Associates, LLC (hereafter, “Ibbotson”), an independent investment research firm.

### Investment Services

After choosing an asset allocation model, the prospective client with the assistance of his or her Financial Advisor will choose the Eligible Investments the client wishes to purchase or transfer in kind to the client’s Advisory Select account (hereafter, the “Program Account”). Unless requested otherwise by the prospective client, the Financial Advisor will recommend Eligible Investments that correspond to the Asset Class Mix of the asset allocation model chosen by the client. Advisory Select is not a discretionary advice program. Princor does not have the discretion to affect transactions in an Advisory Select account without first obtaining a client’s consent. All decisions to purchase, sell, or transfer Eligible Investments to or from the Program Account shall be made solely by the client. The Financial Advisor is available to the client at any time to provide consultation on buying, selling and reinvesting Eligible Investments in the Program Account consistent with the client’s investment objectives.

Princor and its Financial Advisors may provide different investment or asset allocation modeling recommendations to one client in the Advisory Select Program from that given to another client. The Advisory Select Program does not give investment advice as to assets that the client has chosen not to hold in the Program Account.



#### Annual Program Account Reviews

The Financial Advisor will meet with clients at least annually to review the Program Account performance, the Eligible Investments in the Program Account and if necessary may suggest changing the Asset Class Mix due to updated information from Ibbotson regarding the asset allocation model chosen by the client. In addition, the client's Financial Advisor will request information regarding whether there has been any change in the client's ongoing investment objectives, risk tolerance, planned investment time horizon, financial goals, and whether the client wishes to impose any reasonable restrictions on the investments contained in the Program Account.

**The Advisory Select Program is a strategic asset allocation program. Clients should consider carefully whether to rebalance the Program Account portfolio at least annually to match Ibbotson's Asset Class Mix that corresponds to the asset allocation model the client has chosen. Princor encourages clients in the Advisory Select Program to rebalance; however, Princor undertakes no obligation to rebalance the Program Account. Rebalancing may cause tax consequences in a non-qualified Program Account.**

#### Quarterly Performance Reports

Princor provides clients with quarterly reports that show historical performance of a Program Account.

#### Services to Trusts

Princor has entered into an arrangement whereby Financial Advisors may refer clients in need of services by a corporate trustee to Principal Trust Company<sup>SM</sup> (hereafter, "Principal Trust"), an affiliated trust company based in Wilmington, Delaware. If authorized under the trust agreement, Principal Trust may utilize the Advisory Select Program and retain the investment advisory services of a Financial Advisor to make investment recommendations for the trust. In these discretionary trusts, Principal Trust will be the Advisory Select client and will have the ultimate responsibility for determining the investment policy and investment selection. Beneficiaries of trusts administered by Principal Trust as trustee or co-trustee that use the Advisory Select Program as an investment vehicle will receive quarterly statements on the trust from Principal Trust showing assets and activity. Principal Trust Company is the trade name of Delaware Charter Guarantee & Trust Company. More detailed information about Principal Trust's services and fees can be found in materials issued by Principal Trust.

### **III. Eligible Investments and Advisory Select Account Information**

"Eligible Investments" as used in this brochure means (a) domestic equity securities consisting of registered common stock and convertible preferred stock traded on U.S. national exchanges and American Depositary Receipts; (b) load waived shares (or shares not offered with a sales load) of certain mutual funds distributed by Princor or advised by its affiliates ("Proprietary Funds"); (c) shares of mutual funds or closed-end investment companies not distributed by Princor or advised by its affiliates ("Non-Proprietary Funds"); (d) certain unit investment trusts and exchange traded funds ("ETFs"); (e) fixed-income securities consisting of U.S. Treasury and federal agency securities, investment grade corporate bonds, commercial paper, investment grade municipal bonds, registered preferred stock traded on U.S. national exchanges, and mortgage-backed securities; and (f) cash and certain cash equivalents, including certificates of deposit and money market fund shares.

Generally, no other types of assets will be permitted in a Program Account. The following are examples of assets that will generally not be accepted: (a) securities with legal, contractual, or other restrictions on sales, including but not limited to, private placements or company stock owned by insiders; (b) illiquid securities (such as shares of unlisted Real Estate Investment Trusts and interests in limited partnerships or other direct participation programs); (c) common stock or individual bonds, debentures or other debt obligations issued by Principal Financial Group, Inc. or other affiliated companies of Princor; (d) Proprietary and Non-Proprietary mutual funds that have a back-end sales charge; (e) equity securities valued at less than \$5.00 per share regardless of inclusion in the S&P 500 or Russell 1000 indices; (f) non-dollar-denominated securities, (g) warrants or options (puts and calls); (h) derivatives, such as futures or forward contracts, or (i) securities held in margin accounts.

There are more than 150 mutual fund families available to a client through Advisory Select. The mutual funds available are either no-load or may be purchased through the Advisory Select Program at net asset value and without sales charges. Princor conducts a review of mutual funds by Asset Class to assist Financial Advisors in recommending investments to populate the asset allocation model chosen by individual clients. Results are provided quarterly to the Financial Advisors. The information is designed to assist the Financial Advisor in recommending which Proprietary Funds and Non-Proprietary Funds are purchased or sold into the Program Account. The fact that a mutual fund family is the subject of ongoing review by Princor is not, in itself, a recommendation of the fund family or any particular fund. Princor will permit certain individual stocks, convertible securities, American Depositary Receipts, and bonds to be transferred in or purchased by the client into Program Accounts but these assets are not subject to ongoing research, due diligence or review by Princor. Consequently, the Financial Advisors must use third-party research, the quality of which is not guaranteed by Princor. Program Accounts containing these assets may be more volatile.

Clients should be aware that combining different securities across industry and geographical sectors (diversifying) can help reduce the overall risk of their portfolios. Clients can also diversify through the purchase of mutual funds.

To participate in the Advisory Select Program, a client must establish a brokerage account with Princor. Princor's clearing firm is Pershing, LLC (hereafter, "Pershing"). Pershing provides both custodial and clearing services for the Program Account and provides clients with Program Account statements no less frequently than quarterly and with prompt confirmations of securities transactions in the Program Account. Princor does not take any action or provide any advice on the voting of proxies.

#### Trade Error Correction Procedures

In the event of a trade error correction, Princor has specific procedures designed to correct any trade error as promptly as possible. Princor's policy is to rectify the trade error caused by us or our affiliates by adjusting the client account as it would have been had no error occurred. For trades where Princor is at fault or where no fault can be determined, Princor will absorb any losses or gains resulting from that error. If it is determined that the client is at fault, Princor may use its discretion to pass along any losses to the client and Princor will keep any gains resulting from the trade error.

## IV. Advisory Select Program Fees and Minimums

The minimum initial investment is generally \$50,000 for an Advisory Select Program Account. Additional accounts opened by a client or members of the client's household must also meet the \$50,000 per account minimum. Princor reserves the right to close a Program Account if its balance falls below a certain level. Princor also reserves the right to terminate its services if it believes the rendering of its investment advisory services is no longer appropriate for a client.

The value of the Program Account determines the amount a client is charged. The fee is due and payable quarterly in advance and is based on the value of the Program Account assets as of the close of business on the last business day of the preceding quarter according to the following schedule:

ACCOUNT VALUE	FEE*
\$0 – \$250,000	2.00% – 1.00%
>\$250,000 – \$500,000	1.75% – 0.75%
>\$500,000 – \$1,000,000	1.50% – 0.50%
>\$1,000,000 – \$3,000,000	1.25% – 0.50%
>\$3,000,000 – \$6,000,000	1.00% – 0.50%
>\$6,000,000	1.00% – 0.40%

\*Minimum and maximum fee range expressed as annual percentage of account value

In the first three-month period beginning with the date in which the Program Account is opened (the “inception quarter”), the first payment will be assessed on a pro-rata basis to reflect the number of days in the inception quarter that the assets are to be in the Program Account. The amount will be based on the initial amount deposited. Each of the account value ranges (“asset level tiers”) on the fee schedule are subject to a corresponding fee percentage range. The client and the Financial Advisor agree on a percentage fee for each asset level tier. That fee is applied to the asset valuations corresponding to that asset level tier. The amount charged to the client is computed by multiplying the actual account values that fall into the corresponding asset level tiers by their separate fee percentages, and if the account values fall into more than one asset level tier, by then adding the corresponding fees together.

The fees for each asset level tier can, but not necessarily, be subject to reduction as the level of assets in a Program Account increase.

The Advisory Select fee (hereafter the “Program Fee”) covers all advisory services described above, as well as custody and brokerage services. Princor pays a portion of the Program Fee received from the client to Ibbotson Associates, LLC to compensate it for ongoing asset allocation modeling and updates, to Lockwood Advisors, LLC for ongoing account administration services and to the Financial Advisor for their services rendered in connection with the Program Account. The Program Fee does not cover certain fees charged by third parties, such as (i) management fees and expenses charged by Proprietary Funds, Non-Proprietary Funds and ETFs that may be held in a Program Account; (ii) odd-lot differentials, American Depositary Receipt fees and exchange fees, transfer fees and other fees imposed by law; (iii) redemption fees imposed by certain Proprietary or Non-Proprietary Funds; and (iv) any contingent deferred sales charge assessed on the sale or liquidation of Proprietary or Non-Proprietary Fund shares, where applicable. In addition, it does not cover certain services available upon request from Princor, including periodic distribution fees, electronic funds and wire transfer fees, certificate delivery fees, and reorganization fees; and any check reordering cost and fees, where applicable.

**The Program Fee is negotiable within the minimum and maximum fee range expressed and as a result clients with similar assets may have differing fee schedules. Princor may discount the Program Fee below the minimum fee ranges to customers meeting certain criteria, such as having existing insurance, banking, or investment relationships with Princor or its affiliates, or having an immediate family member who is a Financial Advisor. Princor will also discount its Program Fees below the minimum fee levels for competitive reasons or in other situations upon a prospective customer, or client’s request.**

In the event of termination of a Program Account, unearned fees are refunded to the client by Princor on a pro-rata basis; however, due to the administrative costs of establishing accounts in the Advisory Select Program, an early account closing fee of \$500.00 will be applied to accounts terminated within the first 12 months following the date the account was opened.

## V. Conflicts of Interest and Other Expenses Paid by the Client Under the Advisory Select Program

The Program Fee that is paid by the client for participation in the Advisory Select Program is in addition to the underlying management fees and expenses of the Proprietary Funds, Non-Proprietary Funds, and ETFs, which often are standard expenses that all investors purchasing these assets pay on a continuing basis. These management fees and other expenses decrease potential Program Account positive returns and increase potential negative returns.

### Proprietary Funds and Conflicts of Interest

Certain conflicts of interest arise in connection with Proprietary Funds that are permitted into Advisory Select Program Accounts. All Proprietary Funds that are available through the Advisory Select Program pay certain expenses to affiliates of Princor for fund transfer agent and administration services. In addition, some of the Proprietary Funds available through the Advisory Select Program are managed by investment advisor affiliates of Princor and those Proprietary Funds pay investment management fees to Princor’s affiliates. **Although Princor does not directly receive these payments, Princor has a potential conflict of interest when recommending that Proprietary Funds be purchased in or transferred to an Advisory Select Program Account.** However, Princor will not recommend nor permit Proprietary Funds to be purchased by or transferred to a Program Account opened by or on behalf of a trust described in Internal

Revenue Code of 1986, as amended ("Code") § 401(a) which forms part of a plan, or a plan described in Code § 403, which trust or plan is exempt from tax under Code § 501(a); an individual retirement account described in Code § 408(a); an individual retirement annuity described in Code § 408(b); an Archer Medical Savings Account described in Code § 330(d); a health savings account described in Code § 223(d); or, a Coverdale savings account described in Code § 530 ("Qualified Program Account").

To mitigate against this potential conflict of interest with respect to Program Accounts that are not considered Qualified Program Accounts ("Non-Qualified Program Accounts"), Princor's investment guidelines require that any Proprietary Fund purchased in a Non-Qualified Program Account be the share class with the lowest expense structure, currently the Institutional share class of Principal Funds Inc. However, some Proprietary Funds do not have an Institutional share class available, and as such, some Proprietary Funds in a Non-Qualified Program Account may not carry the lowest expense structure.

In addition, certain share classes of Proprietary Funds that may be transferred to a Non-Qualified Program Account pay certain service fees to Princor, including, but not limited to, those paid pursuant to distribution and shareholder servicing plans adopted by the Proprietary Funds under Rule 12b-1 of the Investment Company Act of 1940. These are separate from and in addition to the investment management fees and other expenses. These service fees decrease potential Program Account positive returns and increase potential negative returns. These service fees are in addition to the Program Fee paid by the client. Princor intends to retain these payments to the extent they arise as a result of Proprietary Funds held in a Non-Qualified Program Account, except for situations involving mutual fund sales in non-qualified Advisory Select Program Accounts that were opened by transfers from Principal Passage fee-based brokerage accounts. In these limited situations, Princor passes on 12b-1 fees to the Financial Advisor. As a result, Princor and the Financial Advisor have a conflict of interest in recommending a Proprietary Fund in which these fees are payable. To mitigate this conflict of interest, Princor's investment guidelines require that any Proprietary Fund purchased in a Non-Qualified Program Account be a share class that does not pay these distribution and shareholder servicing fees to Princor, currently the Institutional share class of Principal Funds Inc. Some Proprietary Funds do not have an Institutional share class available. Therefore, some share classes of Proprietary Funds that pay such fees will be permitted to be transferred from other accounts or purchased in the Non-Qualified Program Accounts. Unless such shares are exchanged for another share class, Princor will continue to receive these fees. **By signing the client agreement for Advisory Select, the client acknowledges this potential conflict and consents to the use of the Proprietary Funds in the Non-Qualified Program Account and the resulting payment of any distribution and shareholder servicing fees to Princor.**

#### Non-Proprietary Funds and Conflicts of Interest

Princor is not affiliated with the mutual fund companies that sponsor the Non-Proprietary Funds. However, certain conflicts of interest arise in connection with certain Non-Proprietary Funds that are permitted into Advisory Select Program Accounts. Some Non-Proprietary Funds that may be recommended for purchase in or transfer to the Program Account pay distribution and shareholder servicing fees to Princor. These are separate from and in addition to the investment management fees and other expenses that all investors purchasing these securities pay. These charges decrease potential Program Account positive returns and increase potential negative returns. **These service fees are in addition to the Program Fee paid by the client to participate in the Advisory Select Program. Princor intends to retain these payments to the extent they arise as a result of Non-Proprietary Funds held in Non-Qualified Program Accounts, except for situations involving mutual fund sales in non-qualified Advisory Select Program Accounts that were opened by transfers from Principal Passage fee-based brokerage accounts. In these limited situations, Princor passes on 12b-1 fees to the Financial Advisor. As a result, Princor and the Financial Advisor have a conflict of interest in recommending Non-Proprietary Funds in which these fees are to be payable. To mitigate the possibility of a Financial Advisor recommending certain funds on the basis that they pay these distribution and shareholder servicing fees, Princor's compensation to the Financial Advisor for his or her services with Advisory Select Program Accounts does not vary based on whether or not distribution and shareholder servicing fees are actually received by Princor. By signing the client agreement for Advisory Select, the client acknowledges this potential conflict and consents to the use of these Non-Proprietary Funds in the Non-Qualified Program Account and the resulting payment of any distribution and shareholder servicing fees to Princor. All distribution and shareholder servicing fees received from the Non-Proprietary Funds held in Qualified Program Accounts will be credited to the Program Account.**

Clients who participate in the Advisory Select Program may pay more or less than would be the case if they were to purchase separately each of the services the Advisory Select Program permits. If a client were to purchase the Eligible Investments available through the Advisory Select Program directly from the fund companies, or from other securities broker-dealers, the client would not pay a Program Fee and the purchase may be less expensive. Comparable programs or services may be available from Princor or from other sources for fees lower than those in the Advisory Select Program. Other investment firms may offer to the public other investment products such as mutual funds with asset allocation models similar to those found in Advisory Select. Those programs may have differing fees and charges that may be higher or lower than the Program Fee.

The amount of the fees received by Princor and the Financial Advisors may be greater if a client participates in an asset-based fee arrangement, such as the Advisory Select Program, instead of paying separately for brokerage commissions and receiving incidental investment advice from the Financial Advisors. Generally, the lower the number of transactions in a Program Account, the more expensive the Advisory Select Program becomes when compared to accounts where only commissions are charged to the clients. Factors in addition to the number of transactions that bear upon the relative cost of the Advisory Select Program in relation to the cost of the services purchased separately include the size of the account, the number and type of investments making up the portfolio, and the frequency of rebalancing the Program Account. As a result, Princor and the Financial Advisor may have a financial incentive to recommend certain fee-paying alternatives such as an asset-based fee over another alternative (brokerage commissions) or one type of account over another type of account.

## VI. Information Regarding Princor Financial Services Corporation

### Other Business Activities

Princor's principal business is that of a securities broker-dealer. Princor personnel spend on average in excess of 90% of their time on securities brokerage or mutual fund activities. Princor engages primarily in the sale of mutual funds, variable annuity, and variable life insurance contracts, but also markets unit investment trusts, direct participation programs, and general securities (as an introducing broker to its clearing firm, Pershing, on a fully disclosed basis).

### Financial Industry Affiliations

Principal Funds Distributor, Inc., is the principal underwriter for an investment company (Principal Funds, Inc.). Shares of Principal Funds, Inc. may be sold in connection with Princor's advisory products and pose certain conflicts of interest. Those conflicts dealing with Proprietary Funds are disclosed in Section V of this brochure. Princor is affiliated with Principal Funds Distributor, Inc., Principal Life Insurance Company, Principal Trust and all four are subsidiaries of Principal Financial Services, Inc. Princor serves as distributor for the variable life and variable annuity contracts issued by Principal Life Insurance Company. Generally, Financial Advisors of Princor are either licensed insurance agents or brokers of Principal Life Insurance Company and offer variable life and annuity contracts in a sales capacity for Princor and Principal Life. Their sales capacity as registered representatives of Princor is separate and distinct from their roles as investment adviser representatives of Princor, where they offer services such as Principal Advisory Select Portfolios<sup>SM</sup>.

### Education and Background of Princor Personnel

Generally a college degree or securities industry experience is required for Financial Advisors who provide investment advisory services to clients. Princor does not have an investment committee. Princor employs Ibbotson Associates, LLC to provide investment research and ongoing evaluation of the asset allocation models for Advisory Select. Princor has created investment guidelines and operational procedures for its Financial Advisors to follow as they provide the services to clients participating in the Advisory Select Program. There is also an oversight committee that reviews these investment guidelines and operational procedures and, on certain occasions, will review certain Advisory Select Program Accounts, including the Eligible Investments held by the client. These individuals have qualified as general securities principals (FINRA Series 24) and have at least five years of experience in the securities industry. Not every Program Account will be reviewed by the oversight committee.

The following brief biographical information describes personnel at Princor who are either principal executive officers or have supervisory responsibility with regard to Principal Advisory Select Portfolios<sup>SM</sup>:

Michael J. Beer: Born 1961. Formal education after high school: 1983, BA, Accounting, University of Northern Iowa, Cedar Falls, Iowa. Business background preceding five years: President, since 2006; Vice President, Princor 2000 – 2005.

Ralph Eucher: Born 1952. Formal education after high school: 1974, BA, Political Science, Iowa State University, Ames, Iowa; 1976, MA, Industrial Relations, Iowa State University, Ames, Iowa; 1979, JD, University of Iowa, Iowa City, Iowa. Business background preceding five years: Director, Princor; President and CEO of Princor 2000 – 2005.

Nora M. Everett: Born 1959. Formal education after high school: BS, Iowa State University, Ames, Iowa; JD, William and Mary College, Williamsburg, Va.; Business background preceding five years: Director, Princor Financial Services Corporation since 2008; 2004 – 2008 Senior Vice President and Deputy General of the Principal Financial Group.

Jill R. Brown: Born 1967. Formal education after high school: 1990, BA, Accounting and Administration, Northwestern College, Orange City, Iowa; 1996, MBA, Drake University, Des Moines, Iowa. Business background preceding five years: Chief Financial Officer, since 2007; Financial Controller of Princor 2003 – 2007.

Michael D. Roughton: Born 1951. Formal education after high school: 1973, BA, English, Boston University, Boston, Mass.; 1984, JD, Drake University, Des Moines, Iowa. Business background preceding five years: Counsel to Princor.

Traci Weldon: Born 1965. Formal education after high school: 1987, BBA, University of Iowa, Iowa City, Iowa; 1990 JD, Drake University, Des Moines, Iowa. Business background preceding five years: Compliance Officer for the Principal Financial Group.

Martin Richardson: Born 1960. Formal education after high school: 1983, BBA, Marketing, Iowa State University, Ames, Iowa. Business background preceding five years: Operations Officer and Vice President of Princor - Broker-Dealer Services.

Bret Bussanmas: Born 1966. Formal education after high school: 1989, BA, Finance, University of Northern Iowa, Cedar Falls, Iowa. Business background preceding five years: Vice President – Broker-Dealer Marketing, Princor 2007; Regional Vice President, Individual Distribution - Principal Life Insurance Company 2003 – 2006.

Randy L. Welch: Born 1962. Formal education after high school: 1985, BA, Business, Grandview College, Des Moines, Iowa; 1993, MBA, Drake University, Des Moines, Iowa. Business background preceding five years: Vice President, Principal Management Corporation.

Nicholas Cecere: Born 1964. Formal education after high school: 1986, BS, Economics, Utica College, Syracuse, N.Y. Business background preceding five years: Director of Agencies, Principal; Vice President - Career Distribution of the Principal Financial Group.

Julie LeClere: Born 1961. Formal education after high school: 1991, BS, Psychology, Iowa State University, Ames, Iowa. Business background preceding five years: Marketing Director, Princor since 2006; Marketing Director, Retirement and Investor Services.

Tamara L. Smith: Born 1970. Formal education after high school: 1991, AA, Accounting, American Institute of Business, Des Moines, Iowa; 1998, BA, Management/Marketing, Simpson College, Indianola, Iowa. Business background preceding five years: Senior Compliance Analyst, Princor since 2004; Financial Accounting Leader, Princor, 2000 – 2004.

### Code of Ethics

As part of its compliance program, Financial Advisors are subject to a Code of Ethics that imposes standards of business conduct (hereafter, the “Code”). The purpose of this Code is to prevent conflicts of interest between Princor and its clients that may exist, or appear to exist, and to prevent any violations of applicable laws, when employees and Financial Advisors of Princor (hereafter, “Covered Persons”) own or engage in transactions involving securities. Central aspects of this Code include: the requirement that all personal security transactions be conducted in such a manner as to avoid any actual or potential conflict of interest or abuse of an individual's position of trust and responsibility; fiduciary principles that include the requirement to place the interests of customers first and maintain in confidence information concerning the security holdings of customers and the duty of Covered Persons to comply with applicable federal and state securities laws.

In general, the Code also states that Covered Persons must provide the Princor Compliance Department with certain information prior to and after establishing any account in which they will have beneficial ownership in certain reportable securities. Such information includes quarterly transaction reports and annual holding reports for their personal accounts. Each Covered Person is provided with a copy of the Code and any amendment, and must certify that they have read and will comply with the Code including any amendments. Existing and prospective Princor clients can obtain a complete copy of this Code by sending a written request to:

PRINCOR FINANCIAL SERVICES CORPORATION  
711 High Street  
Des Moines, IA 50392-0200

### Account Review and Supervision

The Financial Advisors are responsible for ongoing review of their client's Advisory Select Program Accounts and are subject to branch office supervision.

### Interest in Client Transactions

Princor in its capacity as a registered investment adviser will not enter into any principal or “agency cross” transactions with Advisory Select Program clients.

Clients may enter into agency transactions with Princor in its capacity as securities broker-dealer and, in such role, Princor may offer variable life, variable annuities, mutual funds, stocks, bonds, and other securities to Advisory Select clients and will charge these clients commissions on the sales of these products. Certain affiliates of Princor have a financial interest in client transactions with respect to the Proprietary Funds if they are purchased by a client in an Advisory Select Program Account. These proprietary funds are managed and sub-advised by affiliates of Princor. The Proprietary Funds pay investment management fees to these affiliates. Although Princor does not directly receive these payments, Princor has a potential conflict of interest between its duty to act in the best interest of its clients and any interest it may have in generating advisory fees for its affiliates by including the Proprietary Funds in the Advisory Select Program.

Proprietary and Non-Proprietary Funds eligible to be purchased in the Advisory Select Program may offer additional compensation to Princor or the Financial Advisor in the form of distribution and shareholder servicing fees. Please review Section V of this Brochure for more information.





WE'LL GIVE YOU AN EDGE®

Principal Advisory Select Portfolios<sup>SM</sup> is sponsored by Princor Financial Services Corporation, a Registered Investment Adviser.  
Securities and advisory products offered through Princor Financial Services Corporation, 888/774-6267, member SIPC.  
Princor® is a member of the Principal Financial Group®, Des Moines, IA 50392.