

AMC Pinnacle

Asset Management Consulting

SunTrust Investment Services, Inc.

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SEC File Number 801-56443

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This brochure provides information about the qualifications and business practices of SunTrust Investment Services, Inc. If client has any questions about the contents of this brochure, please contact STIS at (800) 874-4770. The information in this brochure has not been approved or verified by the United State Securities and Exchange Commission or any state securities authority.

Website Addresses: www.suntrust.com/investmentservices and www.alexanderkey.com

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

Securities and Insurance Products and Services:

•Are not FDIC or any other Government Agency Insured •Are not Bank Guaranteed •May Lose Value

Material Changes

On July 28, 2010, the Securities and Exchange Commission (“SEC”) adopted amendments to Part 2 of Form ADV (“Wrap Fee Brochure”), which is the disclosure document SunTrust Investment Services, Inc. (“STIS”) provides to clients. This Wrap Fee Brochure dated March 31, 2011, is a new document prepared according to the SEC’s new requirements and rules. As such, this document materially differs in structure and requires certain new information that the prior Form ADV Part 2 did not require.

In the future, this section of the Wrap Fee Brochure will contain only specific material changes that are made to the Wrap Fee Brochure, if any, and provides clients with a summary of those changes since the last update.

- BNY Mellon Corporation, the parent company of Lockwood Advisors, Inc. (“Lockwood”), purchased PNC Global Investment Servicing Inc., the parent of PNC Managed Investments Inc. (formerly, ADVISORport, Inc.) in July, 2010.

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Services, Fees and Compensation

SunTrust Investment Services, Inc. ("STIS") is a separate, wholly owned non-bank affiliate of SunTrust Banks, Inc. STIS became a registered broker-dealer under the Securities Exchange Act of 1934, in November of 1985 and an investment adviser under the Investment Advisers Act of 1940, as amended in May, 1999, and was a state registered investment adviser from April, 1996 to May, 1999. Registration does not imply a certain level of skill or training. STIS is a member of the Financial Industry Regulatory Authority ("FINRA") and Securities Investor Protection Corporation ("SIPC").

STIS is an introducing broker-dealer clearing its trades through National Financial Services LLC and its affiliate Fidelity Management Trust Company, if client's account is a qualified retirement account, (the "Carrying Broker" or "Custodian" or "NFS"). Custodian also provides custody and execution services for client's account. The investment advisory services related to AMC Pinnacle (or the "Service") are provided by STIS in conjunction with Lockwood Advisors, Inc. ("Co-sponsor" or "Lockwood"), a SEC registered investment adviser. STIS and Lockwood act as co-sponsors, as defined in Rule 3(a)-4 of the Investment Company Act of 1940, as amended, of the Service and manage client accounts on a discretionary basis as discussed more fully below.

AMC Pinnacle is a Unified Managed Account program, ("UMA") which gives clients the choice of advisory services by combining certain investment vehicles within one account. The available investment vehicles include separately managed accounts, based on models of select model providers, mutual funds, and Exchange Trade Funds, ("ETFs").

As overlay manager, Co-Sponsor develops, in consultation with STIS, various allocation profiles that reflect differing risk profiles. Co-Sponsor's brochure describes its processes for the Service and should be read by the Client along with this Brochure and Supplement before investing in this program.

STIS is responsible for profiling the client, recommending an asset allocation strategy and managing the ongoing client relationship. Co-Sponsor, as overlay manager, manages client accounts on a discretionary basis as discussed more fully below.

Co-Sponsor has sole responsibility for selection of the model providers and models, mutual funds, and ETFs that are available as investment vehicles in this Service, and is responsible for all due diligence with respect to the investment vehicles included in the Service.

STIS and Co-Sponsor each have investment discretion with respect to managing the client's investments in the Service. Co-Sponsor's discretion, as overlay manager, includes the selection and maintenance of model providers and models, mutual funds and ETFs in the Service; modification to allocation profiles; the replacement, reduction or elimination of any investment vehicle in the accounts; account rebalancing; and liquidation of asset positions, if necessary, to generate cash for withdrawals by the client or the payment of account fees.

STIS discretion is limited to the modifications of manager model(s), mutual funds or ETFs within the allocation profiles (within predetermined ranges) which reflect the investment strategies client selected.

Mutual Funds: Mutual Fund values will fluctuate so that an investor's shares, when redeemed may be worth more or less than their original cost. Client should carefully review the fund prospectus and consider the investment objectives, risks and charges and expenses of the investment company carefully before investing.

Money Market Mutual Funds: An investment in a money market mutual fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other governmental agency. Although the funds seek to preserve the value of client's investment at \$1.00, it is possible to lose money by investing in these funds.

International Equity Securities: International investments are subject to special risks, such as political unrest, economic instability, and currency fluctuations.

Bonds: Investments in bonds are subject to risks. The most significant risk is interest rate risk. When interest rates rise, bond values fall, values rise when interest rates decline. Other risks include default risk, or the possibility the issuer will default on the payment of interest and/or principal; call risk, or the possibility the issuer will redeem the bond before maturity; and inflation risk, or the possibility that inflation will outpace the bond's return.

Small Companies: Investments in securities of small companies will fluctuate so that a Client's shares, when sold, may be worth more or less than their original cost.

Exchange Traded Funds: Exchange-Traded-Funds (ETFs) values will fluctuate so that an investor's shares, when sold, may be worth more or less than their original cost. Investors should consider the investment objectives, risks and charges of an ETF carefully before investing. Please read the prospectus carefully prior to investing.

There is no guarantee that a client's investment objectives will be achieved, and past performance is not a guarantee of future results.

Fees
The annual fee ("Program Fee") for the Service is tiered, based on the market value of the client's assets calculated on the last billing day of the previous quarter. The annual fee is negotiable and may differ from client to client based upon a number of factors including, but not limited to, the type and size of the client's account, the range of services provided to the client, and the total relationship between STIS and the client in terms of assets under management or supervision. STIS may discount the annual fee for employees of STIS and its affiliates.

The minimum quarterly fee for an account is \$625. Each account is subject to the minimum quarterly fee, even if the balance falls below the minimum investment. STIS retains the right to adjust the minimum quarterly Program Fee and minimum investment amount under certain circumstances with reasonable written notice to client.

The standard annual Program Fee is determined in accordance with the following schedule:

<u>Assets Under Management</u>	<u>Manager Model</u>	<u>Funds/ETF Model</u>
Up to \$ 500,000	3.00%	2.25%
Next \$ 500,000	2.25%	1.25%
Next \$ 1,000,000	2.00%	1.00%
Balance over \$ 2,000,000	1.75%	0.75%

Program Fees for the Service are charged quarterly, in advance, at the annual rates shown above based on funds under management for an account.

Program Fees are pro-rated for accounts that are opened or closed during the quarter. Multiple AMC Pinnacle accounts held by the same client or members of the client's immediate family (i.e., spouse, children, or parents) may be aggregated for purposes of determining total amount of funds under management. The fees are automatically deducted from the client's account. STIS reserves the right to adjust client fees at its sole discretion.

The initial fee is billed from the date the account is opened on Co-Sponsor's systems, through the end of that calendar quarter in advance and is based on the initial value of the assets placed in the account as of the close of business on the day the account is opened and funded. Thereafter, fees are billed quarterly in advance, based on the value of the account assets at the close of the last business day of the previous calendar quarter. For additional contributions greater than \$25,000 a partial fee will be charged related to the number of days remaining in the calendar quarter. Fees for quarters in which an account is opened or closed are pro-rated as follows: for opening accounts, actual days charged begin with the

day after an account is opened and funded and do not include the day of funding. For closing accounts, actual days charged include all days the account has been under supervision during the quarter, including the day the account assets are transferred out of the account. Fees will not be returned for client withdrawals made during a quarter.

Program Fees paid by clients for the Service may be more or less than the fees charged for advisory, custodial and brokerage services offered separately by STIS, depending on the nature, size and frequency of account transactions and other services. STIS representatives receive Program Fees for recommending the Service to their clients and managing the account relationship. The amount of this Program Fee may be more or less than similar service/program fees received for other programs offered by STIS or received when investment advice, brokerage or other services are provided separately.

Co-Sponsor Fees. STIS pays fees to Co-Sponsor for its services, including advisory services, asset allocation tools, models, Manager and Manager Model research, performance reports, document processing, information systems and other administrative services of 0.25% of the average daily balance of the total assets managed within each AMC Pinnacle account. This fee is included within the Program Fee for each client.

Compensation

STIS receives a portion of the fees in each AMC Pinnacle program for generally managing the client relationship. Part of the quarterly fee STIS receives is shared with the Client's Investment Advisory Representative ("IAR").

STIS may allocate a portion of the fees it receives to the Designated Broker and/or the Custodian for processing and administration, *see Account Requirements and Types of Clients Section below for detail pertaining to the services of the Carrying Broker.*

Valuation

For purposes of the computation of the market value of any securities or other investments in an account, securities listed on a national securities exchange will be valued, as of the valuation date, at the closing price on the principal exchange on which they are traded. Shares of mutual funds and exchange traded funds will generally be valued at their respective net asset values as calculated on the valuation date (or the most recent net asset value if none is calculated on the valuation date) as determined by pricing sources believed by NFS or STIS to be reliable. Any other securities or investments in an account will be valued by NFS in a manner determined in good faith to reflect fair market value. Any such valuation should not be considered a guarantee of any kind whatsoever with respect to the value of the assets in an account. NFS may use a pricing service or other independent evaluator, as well as other independent sources, in computing the value of securities. These values are believed to be reliable, but STIS will not verify the accuracy of the information.

Proxy Voting

Client grants the authority and responsibility for the voting of such proxies and/or engaging in similar activities to Co-Sponsor.

STIS will have no authority or obligation to take any action or render any advice with respect to the voting of proxies solicited or with respect to issuers of Securities in which assets in the Account may be invested from time to time.

Class Action Suits

As custodian, NFS researches client ownership of certified class action suits involving securities for which it holds custody. Once a class action suit has been certified, NFS will screen client ownership records using the specific criteria defined in the suit. Client names and addresses meeting the specified criteria will be provided to the claims administrator assigned by the courts. The claims administrator will then mail all class action notices to the client. Client may elect to participate in the suit; however STIS and NFS are not responsible for submitting documents of behalf of client.

Other fees or charges

Clients may also incur separate fees or charges associated with odd-lot differentials, auction fees, transfer taxes, electronic fund and wire transfer fees, SEC fees on NASDAQ trades, any other fees mandated by law, certain fees in connection with the establishment or administration or termination of retirement or profit sharing plans or trust accounting, and any other charges for special services requested by clients. Some client accounts may hold shares of investment companies, including money market funds, closed-end funds, and/or exchange-traded funds. Those funds have their own expenses, including certain advisory, distribution or other fees, and a client account invested in those funds will indirectly bear a portion of those expenses. Each of the fees discussed above is in addition to the Program Fee.

In addition, we or our affiliate may receive marketing or other payments from exchange-traded investment funds in which client asset-based fee assets may be invested.

In addition to the fees for the Service, clients are subject to certain charges in connection with investments made through the program, including mutual fund/ETF advisory, distribution, early redemption or other fees.

In exercising its investment discretion over client's accounts, Co-Sponsor may invest assets in client's account(s) in shares of a management investment company or mutual fund for which Co-Sponsor or STIS, and/or an affiliate of Co-Sponsor or STIS, perform advisory or other services ("Affiliated Fund") and receive management or other fees for such services ("Affiliated Fund Fees") that are separate and distinct from the fees that Co-Sponsor and STIS receive pursuant to the investment advisory agreement between client, Co-Sponsor and STIS. In the exercise of its investment discretion in accordance with the investment advisory agreement or at client's direction, Co-Sponsor may invest a portion of the assets in client's account(s) in shares of an Affiliated Fund. STIS may receive (to the fullest extent permitted by applicable law) the Affiliated Fund Fees and the fees it receives pursuant to the investment advisory agreement. Information about the Affiliated Fund Fees paid to STIS can be found in the prospectus and/or annual report for the Affiliated Fund and client may be provided with additional disclosure or asked to execute additional consents as, and to the extent, required by applicable law. Client may terminate client's consent and authorization at any time (i) by terminating the investment in the applicable Affiliated Fund, or (ii) by providing written notice to Co-sponsor and STIS of client's intention that this consent and authorization be terminated.

If Client is subject to the provisions of ERISA or Section 4975 of the Internal Revenue Code of 1986, the assets invested in an Affiliated Fund will not be included in the Fee calculation.

Money market funds and other mutual funds, including ETFs in which clients may invest (including Affiliated Funds), or the advisers or principal underwriters of the funds, may make payments to STIS or our affiliates pursuant to a Rule 12b-1 distribution plan or other arrangement as compensation for distribution, shareholder services, recordkeeping, or administrative services; these payments may be paid from the fund's total assets or may be paid by a fund's adviser or distributor. The Rule 12b-1 distribution plan and other fee arrangements will be disclosed upon request and typically are disclosed in the applicable fund's registration statement.

STIS and its affiliates may have a variety of banking, financial, or service relationships with (1) mutual funds/ETFs participating in the Service, (2) corporations or other issuers, the securities of which are purchased in the portfolios of such mutual funds/ETFs, and (3) the other Service Providers and their affiliates. Such relationships may involve a receipt of compensation or other benefits by STIS and its affiliates. From time to time, STIS or its affiliates may also receive training, marketing materials, or other marketing support from mutual funds and ETFs participating in the Service. Such arrangements may be based on the size and duration of holdings in a mutual fund/ETF. This additional compensation and/or other benefits are in addition to fees paid by clients for the Service and are used, in part, to offset the costs of administering the Service.

Account Requirements and Types of Clients

A minimum investment of \$250,000 is required to open an AMC Pinnacle account.

AMC Pinnacle clients must open a brokerage account with STIS. NFS executes and clears purchase and sale orders directed to it by Co-Sponsor; provides transaction confirmations, account statements, annual reports, prospectuses and tax reporting information directly to clients; and provides custody services for cash and securities in client accounts. In addition, NFS will send Co-Sponsor's third party proxy service provider requests for shareholder proxies, reorganization, or other actions to be taken with respect to securities held in the client's account. AMC Pinnacle clients do not deal directly with NFS.

As custodian, NFS researches client ownership of certified class action suits involving securities for which it holds custody. Once a class action suit has been certified, NFS will screen client ownership records using the specific criteria defined in the suit. Client names and addresses meeting the specified criteria will be provided to the claims administrator assigned by the courts. The claims administrator will then mail all class action notices to the client. Client may elect to participate in the suit; however, STIS and NFS are not responsible for submitting documents on behalf of the client.

Upon opening a brokerage account it is important that client understands that in order to help the government fight the funding of terrorism and money-laundering activities, to meet Federal law and contractual obligations to NFS, STIS is required to verify client's identity by obtaining client name, date of birth, address, and a government-issued identification number before opening a brokerage account. In certain circumstances, STIS may obtain and verify this information with respect to any person(s) authorized to effect transactions in an account. For certain entities, such as trusts, estates, corporations, partnerships or other organizations, identifying documentation is also required. Client account may be restricted and/or closed if STIS cannot verify this information. Neither STIS nor NFS will be responsible for any losses or damages (including, but not limited to, lost opportunities) resulting from any failure to provide this information, or from any restriction placed upon, or closing of, the client's brokerage account. Further, if client is a foreign financial institution, client agrees that in establishing a brokerage account with STIS that client will not open or maintain client's brokerage account for or on behalf of any third party and that client will not allow any third party to use or access any brokerage account that client opens at STIS.

The Service is available to individuals, corporations and other business entities, pension and profit sharing plans, charitable organizations and not-for-profit organizations. STIS reserves the right to accept, reject or renew any client for the Service.

Portfolio Manager Selection and Evaluation

In offering the Service, STIS representatives work with individual clients to create a personal Client Profile and Questionnaire (the "Client Profile") that identifies the client's goals, risk tolerance, time horizon, financial situation and other factors that influence investment approach. Depending on the client's financial goals and available assets, the representative may recommend to the client the AMC Pinnacle program. The Client Profile proposes an asset allocation strategy based on the client's answers to the questions posed by their STIS representative. The client then selects the appropriate program based on this recommendation. If the client chooses the Service, the representative will recommend the initial Investment Products for the account. Advisor will have authority to change the Manager Models, Program Funds or ETFs within the Allocation Profiles, from the available list of Investment Products and within predetermined ranges, to reflect the investment strategies client selected. Co-Sponsor establishes and maintains the list of Investment Products for each investment style and market capitalization category.

After reviewing and approving an investment proposal, the client, with the representative's assistance, opens an account and signs a brokerage account agreement, a disclosure form and an investment advisory agreement authorizing management of the account in accordance with the terms and conditions of the program. Primary responsibility for the day-to-day supervision of the STIS representative lies with the representative's supervising principal, who reviews and accepts new accounts.

Co-Sponsor provides STIS with a quarterly investment performance report (“Quarterly Report”) for each client. STIS will provide the Quarterly Report to client upon request. This is a detailed report on the client's assets invested in the Service, including performance data for the most recent quarter, year-to-date and since-inception-to-date. The Quarterly Report includes:

- Market Commentary
- Current Account Holdings
- Account Performance
- Transaction Detail

STIS believes this information is reliable; however, STIS will not independently verify the accuracy of any information in a Quarterly Report. Client should read the Co-Sponsor’s disclosure document before investing in this program.

Client Information Provided to Portfolio Managers

The STIS representative will attempt to contact each AMC Pinnacle client no less than annually, to review the client’s account and reconfirm their financial and investment objectives. The purpose of this review includes a determination as to whether any adjustment to their asset allocation strategy may be appropriate. STIS also periodically offers clients the opportunity to notify their representative of any changes to their financial and tax situation, risk tolerance or financial goals. The client, however, remains responsible for notifying STIS of any material change in his or her investment profile. Information received by the representative is submitted to Co-Sponsor.

Client Contact with Portfolio Managers

AMC Pinnacle clients do not generally interact directly with Co-Sponsor personnel, but may do so through STIS.

Additional Information

Disciplinary Information

5/17/05 Securities and Exchange Commission File Number: 3-11924, Cease-and-Desist and Censure

The SEC alleged that between 2001 and 2002, STIS sold class A share mutual funds without providing certain customers with reductions on front-end loads or sales charges. Without admitting or denying the allegations, STIS consented to the findings, to the entry of a censure and cease-and-desist order and to refund break point discounts along with prejudgment interest to certain customers STIS identified in a self assessment and to make written notice to all customers who purchase class A mutual fund shares from STIS from 1/1/99-12/31/03.

6/29/05 NASD Case Number: 20042000229-01, Monetary Fine: \$15,000 and Censure

STIS submitted a Letter of Acceptance, Waiver and Consent (“AWC”) in which the firm was censured, fined \$15,000 and required to revise its written supervisory procedures regarding compliance and applicable securities laws and regulations and rules relating to Trade Reporting and Compliance Engine (“TRACE”) securities. TRACE facilitates the mandatory reporting of over the counter secondary market transactions in eligible fixed income securities. Without admitting or denying the allegations, STIS consented to the described sanctions and to the entry of findings that it failed to report transactions in TRACE-eligible securities in a timely fashion, that the firm’s supervisory system did not provide for supervision reasonably designed to achieve compliance with respect to applicable securities laws and regulations, and NASD rules relating to TRACE reporting.

8/7/06 NASD Case Number: EAF0401290001, Monetary Fine: \$150,000 and Censure

STIS submitted a letter of AWC in which the firm was censured and fined \$150,000. Without admitting or denying the findings, STIS consented to the described sanctions and to the entry of findings that it failed to retain emails in compliance with the three-year retention requirement of Section 17(a) of the Securities Exchange Act of 1934 and SEC rule 17a-4.

7/30/07 Maryland Securities Commission Case Number: FA 2000-2028; 2006-043, Monetary Fine: \$4,500.

Maryland Securities Commission alleged that STIS investment advisory representatives were not properly registered with the State of Maryland. STIS refunded advisory fees equal to amount allocated to the investment advisory representative for the period of time that a STIS employee was not registered as an investment advisory representative in Maryland, agreed to follow compliance policies and procedures designed to prevent any future unregistered investment adviser representative activities and paid a fine of \$4,500.

7/22/10 FINRA Case Number: 2006007105102, Monetary Fine: \$900,000 and Censure

FINRA alleged violations of NASD Conduct Rules 2110, 2310 and 3010. Specifically, FINRA alleged that STIS, through two former brokers, recommended unsuitable short-term unit investment trusts (“UIT”), closed end funds (“CEF”) and mutual fund transactions and recommended unsuitable transactions on margin; that STIS failed to supervise two brokers, and that STIS failed to ensure that customers received the most favorable sales charge discounts on certain UIT purchases. In addition, FINRA alleged that STIS lacked adequate systems and procedures relating to UITs, CEFs and margin accounts. Without admitting or denying the allegations, STIS settled the matter by agreeing to the entry of FINRA’s findings, to a censure and to a monetary fine of \$900,000, disgorgement of \$223,997 in commissions, and to the repayment of \$539,371.28 plus interest for applicable rollover or exchange discounts to 17 customers.

Other Financial Industry Activities and Affiliations

SunTrust Investment Services, Inc. (“STIS”) is registered as a broker-dealer under the Securities Exchange Act of 1934. The principal business of STIS is that of a registered securities broker-dealer. STIS and its registered representatives spend the majority of their time selling investment products customarily associated with those of a broker-dealer while acting in their registered representative capacity. Less than 30% of their time is spent on providing investment advisory services. IARs may also be Licensed Insurance Agents and sell fixed and variable annuities, as well as life insurance products through either STIS or SunTrust Insurance Services, Inc.

STIS has entered into a certificate of deposit selling group agreement with an affiliated broker-dealer, SunTrust Robinson Humphrey, Inc. (“STRH”). Under the agreement, STIS will offer to its clients individual time deposits, including deposit notes and certificates of deposit (collectively referred to as “CDs”) of federally insured depository institutions (“Issuers”), including SunTrust Bank, an affiliate of STIS. IARs may recommend fee-based CDs to their clients. STIS does not receive any compensation relating to the distribution of the CDs. SunTrust Robinson Humphrey, Inc., an affiliated broker-dealer, structures the CDs and is compensated by the Issuers, including SunTrust Bank, for their services. The Issuer receives the proceeds from the offerings.

STIS has entered into a solicitor agreement with an affiliated investment adviser, RidgeWorth Capital Management, Inc. (“RidgeWorth”). Under the agreement, STIS IARs solicit clients for RidgeWorth’s advisory services and STIS receives compensation for the solicitations. STIS also has a services agreement with RidgeWorth for various services that STIS provides to shareholders of RidgeWorth Funds which are advised by RidgeWorth. These services may include 1) shareholder record keeping and account services, 2) providing information to our clients regarding the funds, and 3) recommending shares of the funds for investment. STIS may also provide other services not listed here which are beneficial to the funds. These fees are paid from RidgeWorth’s corporate funds.

STIS has the following agreements with SunTrust Bank, an affiliate of STIS that routinely and primarily engages in offering deposit, lending and other services customarily associated with those of a commercial bank:

Networking Agreement: Under this agreement, STIS representatives are dually employed by STIS and the SunTrust Bank and offer investment products and services to SunTrust Bank clients.

Administration and Operational Services Agreement: Such items as business insurance, facilities management allocation, audit/internal control and human resources allocations, among other items are provided to STIS by SunTrust Bank at lower costs than could be provided by external vendors.

Solicitation Agreement: Under the agreement, STIS may refer clients to SunTrust Bank for investment advisory or asset management services.

Referral Incentive Plan: Under the plan, SunTrust Bank employees are paid a nominal referral fee by the SunTrust Bank for making general referrals of customers to STIS. Such referrals may result in a client opening an account and/or the purchase of other securities. However, the payment of the referral is not conditioned on the opening of any account. STIS reimburses the SunTrust Bank for the referral fees the Bank pays.

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

Code of Ethics

STIS has adopted a Code of Ethics (“Code”) for its advisory business which is intended to reinforce the fiduciary principles that govern the conduct of the firm and our personnel. This Code sets the standards of conduct expected of our advisory personnel, safeguards to material nonpublic information about client accounts and transactions and requires certain personnel to report their personal securities transactions. A copy of the STIS Code is available upon request from any STIS IAR.

Participation in Client Transactions

STIS and our investment personnel may recommend securities in which we or our investment personnel or employees have a financial interest or control relationship directly or indirectly, and we or our investment personnel may buy and sell securities that we or they recommend to advisory clients for purchase and sale. They may also give advice and take action in the performance of their duties to clients that differs from advice given, or the timing and nature of action taken, with respect to other clients’ accounts.

Personal Trading

Personal securities transactions by STIS employees or transactions for the firm’s affiliates may raise potential conflicts of interest when a security is traded that is 1) owned by client or 2) considered for purchase or sale for client. STIS has, as part of its internal compliance program, adopted policies and procedures which impose certain rules and restrictions as to transactions for the firm's account and for the accounts of employees and affiliates. Such policies and procedures are designed to prevent improper or unethical conduct whenever a potential conflict of interest may arise. Personal trading by our employees must be conducted in compliance with all applicable laws and procedures.

As a broker-dealer, STIS maintains an investment account to meet its net capital requirement. This account is invested in U.S. Treasuries and a high quality money market fund in which clients may also invest; however, due to the nature of these investments, and the fact that none of our affiliated entities are involved in their underwritings, there are no conflicts of interest.

STIS and Co-Sponsor perform for other clients services similar to those that are provided to the Service client, as well as other types of investment related services. STIS and Co-Sponsor may take actions and give advice that may differ from the advice given, or in the timing and nature of the action taken, with respect to the account of an AMC Pinnacle client. Neither STIS, Co-Sponsor nor anyone associated with either of them has any obligation to make or refrain from making to an AMC Pinnacle client recommendations, purchases, sales, or transfers of any investment that may be purchased or sold for any other client or for the benefit of anyone associated with them. Transactions in any specific investment may be executed at different times and prices for different clients. STIS and Co-Sponsor may utilize different schedules as they

relate to fees for the Service; therefore, the costs of obtaining services similar to AMC Pinnacle may be more or less than those charged to other clients of Co-Sponsor or STIS.

STIS IARs may not purchase or recommend the purchase of securities issued or guaranteed by SunTrust Banks, Inc. or purchase or recommend the purchase of securities issued by The Coca Cola Company.

SunTrust Bank, its affiliates and their employees may make political and charitable contributions to various persons and organizations. The ensuing goodwill may result in added business to STIS.

Review of Accounts

Supervisory reviews are conducted by the firm's Central Supervision Group, which consists of a Group Supervisory Specialist Manager, three Group Supervisory Specialist ("GSS") Team Leads and 20 to 22 Group Supervisory Specialists who report to their respective GSS Team Leads.

Each GSS Team Lead and their GSS Team are responsible for reviewing AMC program account opening documentation, trading within each account and the annual review process, among other items for their designated areas. The firm utilizes a surveillance program that the GSS' use to monitor the trading in AMC Fund Select Advisor accounts via alerts and filters on a daily basis.

Clients will receive confirmations of all transactions in their accounts and monthly and/or quarterly account statements from our clearing broker, NFS. Clients have the option of waiving receipt of confirmations of specific transactions and receiving that information on a periodic basis.

Co-Sponsor will prepare Quarterly Reports which compares the client's account to leading securities market indices. Co-Sponsor may rely on information provided by third parties, such as recognized independent quotation and valuation services. STIS believes that this information is reliable; however, STIS will not independently verify the accuracy of the information provided by these services. A copy of the Quarterly Report will be sent by STIS to client upon request. If the client chooses to receive Quarterly Reports, they will be available to the client following the end of each calendar quarter during which the account is open. Clients will not be charged a fee in addition to the Program Fee described below if they choose to receive Quarterly Reports. Clients should compare their performance report information to their monthly or quarterly account statements from NFS and should report any discrepancies to their STIS IAR.

Payment for Client Referrals

SunTrust Bank employees are paid a nominal referral fee for making general referrals of customers to STIS. **See Other Financial Industry Activities and Affiliations, Referral Incentive Plan, above for details.**

Other

Soft Dollars

STIS does not have any soft-dollar arrangements.

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